

SEP 23 2019

Daniel Collins, NC Psychology Board  
895 State Farm Road, Suite 101  
Boone, NC 28607

Bill Brandhorst, Psy.D.  
1245 Camp Road  
Salisbury, NC 28147

**Re: Proposed Rule Change Under 21 NCAC 54.2001 (Supervisor)**

September 16, 2019

Dear Mr. Collins:

I am writing in regards to the proposed amendment that would require a supervisor who engages in supervision to complete a 3-hour training session. I would like to go on record as **opposing** such a change as I believe it would place an undue financial burden on many of us that are required to supervise by our places of employment (i.e. where providing supervision is mandatory and not a choice).

Those who choose to supervise are able to charge a supervision fee from their supervisee's which would allow them to cover the cost of the training. This is something that I am not allowed to do because supervision is covered "in-house" and provided pro bono to employees that require supervision.

With the other proposed changes, I would now have to pay an additional fee for 3 hours of supervision training in addition to the increased number of CEU's the Psychology Board is proposing. I would also have to pay to take a bi-annual Ethics exam even though such content is frequently covered in ethic's courses offered as CEU's. I feel this requirement to be unnecessary.

Sincerely,

  
Bill Brandhorst, Psy.D.