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Central Prison Mental Health
1300 Western Blvd
Raleigh, NC 27606

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

To whom it may concern:

I am a doctoral-level psychologist licensed by the NC Psychology Board since 2013; I am also licensed in Virginia and was previously licensed in Colorado. I graduated from the Clinical Psychology program at Emory University in Atlanta. I am currently practicing full-time in the inpatient correctional setting. I am writing to provide comments on multiple proposed rule changes.

Regarding 21 NCAC 54.1901, I am only in support of adding an ethics examination upon licensure renewal if such is implemented in an affordable and convenient manner for licensees. The only way I can imagine that happening is if the examination is a free (or very modestly priced) part of the online renewal process and that multiple attempts to secure a passing score are allowed. I do not support adding the burden of reporting to an official test taking center every two years. I would be most interested in seeing an ethics examination that reflects the most common ethics violations or concerns reported to the Board during each two-year cycle.

Regarding 21 NCAC 54.2001, I am in support of requiring board supervisors to complete supervision training. I believe this will help improve the quality of not only the supervision provided to supervisees, but, as a result, of the psychological services provided to the public.

Regarding 21 NCAC 54.2008, I am in support of doing away with career-long supervision requirements for LPAs, and the proposed changes seem reasonable to me. I have worked and currently work with and provide board supervision to several level 3 LPAs whom I am confident do not require my supervision services in order to provide exceptional psychological services to the public. Some have been practicing since before I was born. I believe psychology unfairly and unnecessarily restricts our master's level clinicians compared to other disciplines. On a related note, I would also like to see LPAs added to the list of clinicians able to participate in the involuntary commitment process in this state.

Regarding 21 NCAC 54.2104, I am in support of increasing the CE requirements for psychologists. Our requirements are certainly low compared to nation-wide averages. However, I am NOT in support of requiring all licensees to submit documentation of their CE activities. I believe the current auditing system sufficiently ensures that licensees are completing requirements.

Regarding 21 NCAC 54.2703, I am in STRONG support of doing away with the requirement to display our license/certificate in our primary place of employment. There are serious safety concerns with doing so in the correctional setting, and I will be much relieved to do away with this obligation.

Thank you for your time and the opportunity to contribute comments on these proposed changes. If I may provide any further clarification, please do not hesitate to contact me using the information below.

Sincerely,

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