

September 6, 2019

Mr. Dan Collins, Executive Director, NC Psychology Board  
Dr. Robert Hill, Chair, NC Psychology Board  
Members, Board of Directors, NC Psychology Board

Re: Proposed rules changes to end career-long supervision for LPAs

Greeting All:

Thank you for your time and effort in reviewing the rules governing supervision for LPAs. Being in the field for 31 years, I am grateful for your consideration of this rule.

I am in full support of LPA's receiving supervision for some time after graduation; however, career-long supervision is not clearly justifiable after one has practiced for an extended period. According to Psychologist K. Anders Ericsson, a person is considered an expert in the field after 10,000 hours of work that is 4.81 years of practice. All other disciplines which are less trained than LPA's require between 2000 to 3000 hours of supervision and in some disciplines, these hours are accrued while they are still in school.

Please allow me to share information from one of my very seasoned colleagues, which I concur 100%.

*Supervision requirements should be based on data, desired outcomes, and actual results.*

- *Research data say that no public protection benefit (improved competency) is gained by supervision beyond three to five years. None.*
- *Positions for which LPAs have been specially trained to do are left unfilled because of budget constraints combined with the multiple "costs" of supervision.*
- *Fewer psychological services, traditionally provided by LPAs, are available to those who need them, especially in rural areas.*
- *Professional services that LPAs are the best trained to deliver are increasingly being turned over to other Masters' level practitioners.*

*From the LPA perspective:*

- *Many jobs are now closed to LPAs and filled by other, sometimes less qualified, Masters' level practitioners not encumbered by supervision requirements.*
- *LPAs are leaving the discipline in increasing numbers. Career-long supervision is expensive, makes LPAs less "reimbursable" by insurance, and renders them less able to compete with other, independently practicing, and Masters' level practitioners.*
- *Psychology has historically enjoyed recognition for its empirical foundations and educational rigor. Both are at risk today.*

I recall vaguely reading something that stated (forgive me if I am not repeating it correctly) because of LPA's training; on-going supervision is needed to protect the public. According to research, there is no benefit of career-long supervision to the quality of care clients receive or the protection of the public. Personally, there has been no benefit to me receiving supervision after being in the field for 31 years treating the same disorders.

From speaking with my colleague who has been on the front line of these issues longer than I reports, *“there appears to be no empirically based to continue career-long supervision of LPAs.”*

We are a dying field because of career-long supervision and limitations it poses. I regretfully say I may be joining them if things do not get better for LPA's.

I hold a doctoral degree in sport and performance psychology and have completed all of my supervision hours in that field. I now have a thriving private practice in both clinical and sport psychology, but I am losing money on the clinical side.

Thank you for taking the steps needed to end career-long supervision for LPA's.

Sincerely,

*Dr. D. Coffey*

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