

September 27, 2019

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

Re: **21 NCAC 54.2008** (proposed rule change to end career-long supervision)

- I've been licensed as an LPA by this Board since 1983 (36 years)
- I've been involved with NCAPP in various capacities for more than 25 years
- I served two terms on this Board in the early 2000s
- And I participated in the NCAPP/NCPA task force, maybe 5 years ago, that sought to find a way to end career-long supervision for LPAs

Thank you for taking a fresh, and long overdue, look at this question

Some considerations to keep in mind.....

- Competency on*
- Beyond three to five years, the data say supervision does not provide any additional **protection to the public**
 - Career-long **supervision makes LPAs more expensive to hire than comparable Masters-level professionals,**
 - **Many jobs are now closed to LPAs** and filled by other, sometimes less qualified, Masters' level practitioners.
 - Career-long supervision is expensive, makes LPAs less "reimbursable" by insurance and renders them less able to compete with other, independently practicing, Masters' level practitioners.
 - **As a result, LPAs are leaving the discipline in increasing numbers or opting not to become psychologists in the first place.**
 - **Which has led to fewer psychological services,** traditionally provided by LPAs, are **available** to those who need them, especially in rural areas.

During the NCAPP/NCPA taskforce discussions, there were no objections to LPAs having a path to independent practice nor any concern about potential harm to the public.

9:30a-12p at the Wingate Hotel on Lanada Road in Greensboro
9:30 a.m. - 12:00 p.m., at the LaQuinta Hotel, 1201 Lanada Road, Greensboro, NC.

Danella Carver

Supervision yes; how long? yes