

September 1, 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

Thank you for taking another look at the rules governing supervision for LPAs. As a former two term member of your Board, I especially appreciate the work you do to protect the citizens of NC. I also appreciate how much work is involved in rules changes—start to finish.

Informing my perspective: 36 years as an LPA, more than 10 years' involvement in NCAPP leadership and my participation in the most recent NCAPP/NCPA task force that, in part, addressed this issue. Now, to speak to ending career-long supervision for LPAs ...

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 specifically 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, Masters' level practitioners.
- **Psychology** has historically enjoyed recognition for its empirical foundations and educational rigor. Both are **at risk today**.

During my time on the board, I attended an ASPPB meeting where the “Masters Issue” was addressed. I collected the literature provided and passed it along to the then current NC board and its attorney, Sondra Panico. The research cited then indicated no benefit of ongoing supervision to quality of care or protection of the public. I believe there's been no change in that finding.

In fact, during the most recent NCAPP/NCPA taskforce discussions, NCPA/LPs raised no objections to LPAs practicing independently. Their objection was to LPAs using the title of “psychologist.” So....no concern expressed by NCPA representatives about LPAs practicing independently or potential harm to the public.

In sum, there appears to be no empirically based reason to continue imposing career-long supervision on LPAs. Instead, perpetual supervision imposes loss of services, excessive cost, restraint of trade, expanded carbon foot print, wasted resources, excessive paperwork, needless administrative activity, and undue hardship—all with no benefit to or protection for the citizens of NC. Indeed, there's considerable reason to believe that current LPA supervision rules penalize NC citizens who need their services and put them at risk.

Again, my thanks to you for taking a fresh, and long overdue, look at the unnecessary supervision rules for LPAs, how these rules prevent NC citizens getting the help they need and putting at risk the services NC depends on LPAs to deliver.

With appreciation and regard,

*Pamela Corbett*

Pamela Corbett, LPA  
Licensed in 1984, #0923

3560 Buena Vista Rd.  
Winston Salem, NC 27106  
336.761.1121