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Sent: Tuesday, September 24, 2019 10:57 AM
To: NO Reply <NoReply@ncpsychologyboard.org>
Subject: rule addressing supervision 21 NCAC 54 .2008

Daniel Collins, NC Psychology Board

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9/24/19

I am writing this letter in support of the rule addressing supervision 21 NCAC 54 .2008.

As an NC LPA, I am well aware of the increased burdens that career-long supervision places upon my ability to practice as a mental health provider. Not only has perpetual supervision prevented me from securing desired employment, it places an undue financial burden upon me. I have directly been turned down for employment at several agencies specifically because of my status as an LPA. Citing my inability to bill third party payers because of being an LPA, I have missed out on potential career advancements. Increasingly, agencies will not hire, by policy, LPA's. Citing the burden of perpetual supervision for LPA's, as well as LPA's limited ability to bill third party payers because of perpetual supervision, agencies have increasingly chosen to not hire LPA's. Most agencies will hire other master's level providers such as LPC's, MSW's or LCSW's, but not LPA's. In addition, I am also burdened with paying a doctoral level psychologist a large sum every month to provide supervision. Given that reimbursement for LPA's, when it can be secured, is less than other providers, I am faced with decreased revenue. Furthermore, it prevents me from working at such agencies as the Red Cross and other relief agencies that will not hire a mental health volunteer or employee that requires perpetual supervision. There is certainly a very high societal cost of keeping LPA's from providing mental health services as a volunteer or employee at such agencies. In summation, I would emphasize strongly, that a rule change which modifies the need for career long supervision for LPA's should be made and I hope the Psychology Board will support such a change.

David Thompson, LPA