

September 23, 2019

NC Psychology Board
895 States Farm Road, Suite 101
Boone, NC 28607

Dear NC Psychology Board Members:

This letter is in support of the proposed rule changes regarding ending perpetual supervision for LPAs. I was licensed as an LPA by the NC Psychology Board in 1991 and received the reduced supervision as soon as it became available. During my 28 years of providing psychological services to the citizen of North Carolina, I have never had a complaint made to the Psychology Board or to a supervisor. I was in a group practice for 17 years, and have been in a solo practice for the last 11 years.

The requirement to maintain perpetual supervision has had a costly impact on my ability to function and provide services to my clients over the years. I found it necessary to also become licensed as a Licensed Professional Counselor as most insurance do not recognize non-doctorate level psychologists and refuse to place them on their panels (BC/BS of NC is a notable exception). I maintained my LPA in order to provide psychological assessments, an area that is truly under served in the more rural areas of NC. In the past 20 years I have provided contract services for psychological assessments in multiple school systems. There is a serious shortage of school psychologists in NC, which is only growing with the increased need for mental health services in all schools. This is an area of need that few doctorate level psychologists have shown interest in serving, and which only those with a degree in psychology are able to fill. While I have received ongoing supervision, few of my supervisors have any familiarity with the legal/procedural obligations of providing Exceptional Children evaluations in the educational setting.

Over the years, the value of my supervision has ranged widely. I am fortunate that currently I have a supervisor who is able to provide relevant supervision for my current needs. But as many LPA's, I must travel to another county to obtain supervision. That increases the amount of time supervision requires 3 fold due to the travel, which is not uncommon. I am also fortunate that I am able to afford her rate. When I was needing to transition to a new supervisor due to a change in my practice, only one LP returned my telephone call, even when I reached out to other out-of-county LPs. I can only imagine the limited resources available in the counties north and west of me.

Numerous reasons have been repeated over the years to justify keeping LPAs under supervision. I doubt that my clients would find much value in those arguments. Indeed, many have voiced frustration and disappointment when they needed to transition to Medicare upon learning that I could not continue as their provider due to not being accepted as a Medicare provider. LPA's are as competent to provide quality services as the other disciplines of mental health providers which allow .

As part of the age group of LPA's that will be approaching retirement in the next few years, the issue of ongoing supervision becomes a determining factor. While I love what I do, transitioning to part-time, or temporary work becomes cumbersome and tiresome when supervision needs to be maintained. On the other end of the spectrum, it is difficult to recommend to any potential student that they consider a career in psychology when my own profession has not trusted me or my colleagues to function independently. Some argue that only those desiring to earn a Ph.D. or Psy. D. should enter the field. When I was in graduate school at the University of Houston, which offered a terminal master's degree to

supply the growing need for community mental health providers, a professor noted that the students in our program were fundamentally different from the Ph.D. students even though we had the same qualifications for admissions. We were the ones who wanted to be on the front lines of providing services, working where the need was greatest but often the pay was the lowest. It was the 70's and many of us were idealists. I still believe in the need for trained psychologists to be accessible to our communities, rural and urban. I believe the more elitist our profession becomes the less we are available to those who may need us the most. I believe that is an unintended consequence of requiring ongoing perpetual supervision.

I truly appreciate the members' of the NC Psychology Board willingness to bring new eyes to this issue. And I hope that the needs to the citizens of North Carolina will speak louder than any territorial concerns of either LPAs or LPs. Thank you for this opportunity to share some of my thoughts

Gratefully,

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