

October 15, 2019

To: Daniel Collins
NC Psychology Board
895 State Farm Road Suite 101 Boone, NC 28607

In reference to: Proposed rule change under 21 NCAC 54.2008

My name is Holly Hauser and I am a Licensed Psychological Associate in Charlotte, NC. I recently obtained my license in April 2019 and have been working in private practice at Carolina Psychology Center, PLLC with my colleague and fellow LPA, Jayme Yodice.

I was fortunate to graduate with my Master's Degree in Clinical Psychology from Appalachian State University in December 2018. This program was intense and rigorous, adequately preparing me for clinical work in the field as soon as I graduated. Sadly, Master's programs in Clinical Psychology are dwindling and are hard to find in NC. I hope that these programs will not become obsolete and urge those who are in charge of making these decisions to recognize the overwhelming burden of mental health in America. How would decreasing opportunities and eliminating programs for mental health professionals at the Master's level in Clinical Psychology help to alleviate this burden? I assert that this would be harmful to society and our community at large, which is exactly the opposite of what we strive to practice in our ethical duties set forth by the APA and the NC Psychology Board.

From the beginning of my graduate training and currently as a new psychological associate, I have obtained weekly supervision. In private practice, it is understood that the clinician is responsible for choosing and paying a supervisor. I believe that LPAs should be treated the same as other Master's level clinicians who no longer need supervision after meeting certain hour requirements. LPAs have the same training, if not more, than LPCs, LMFTS, LCSWs, and the like, so it is puzzling why LPAs must continue supervision for life. In addition, research in the field suggests that no one field or specialty out ranks the other in terms of greater outcomes or effectiveness. With that said, it is confusing to me why LPAs are held back in so many domains when compared to all other mental health professionals.

Supervision, while necessary and helpful, in my opinion, should not be required after a certain number of hours/years of experience have been met by the clinician. To expect LPAs to obtain a supervisor for the duration of their career is unfair. It is also unfair to expect LPAs, many of those who are in private practice, etc., to pay for their own supervision for the duration of their career. Just in this year (2019) alone, I will have paid almost \$4,000 to my supervisor. Imagine this yearly fee for the next 30+ years---that is upwards of \$100,000 spent on supervision. While I value the supervision I am receiving, I do not believe it should be forced or a requirement for LPAs after a certain time. I do believe that LPAs should seek supervision when necessary on unfamiliar cases or when support is needed as deemed by the APA Code of Ethics and the NC Practice Act.

Bulleted below are also points in which I ask the Board to take in consideration regarding LPA licensure:

- I believe in independent Master's level licensure (to take the place of level 3 supervision for life)
- I ask that LPAs are allowed to maintain a title that includes *psychologist* in what we are "allowed" to call ourselves
- I ask that LPAs are not restricted or limited in the scope of psychological practice (we were all trained in psychological evaluation as well as clinical practice)
- This progression toward independence does not need to hinge on an accreditation process that has yet to be defined, let alone accredited
- Old NCAPP and NCPA negotiations from 2013 are a moot issue at this point
- Lastly, I believe that there should not be any contingency that this independent LPA license is given/grandfathered at the expense of discontinuing future LPA licensure in NC

I am grateful to be a Master's level clinician and serve my community by providing therapy and psychological evaluations. I am hopeful that changes will be made so that LPAs can feel equal to and respected by other mental health professionals. We are licensed mental health providers who are making a difference. Please support us by hearing these concerns and taking action on our behalf!

Sincerely,
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