

## NO Reply

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**From:** Tracie LCC <tracie\_lcc@hotmail.com>  
**Sent:** Sunday, November 3, 2019 6:56 PM  
**To:** NO Reply  
**Subject:** Support the proposed rule change 21 NCAC 54.2008

To Whom It May Concern,

I fully support and highly recommend the proposed rule change 21 NCAC 54.2008, that will end career-long supervision for Licensed Psychological Associates (LPAs). Professionally, I have been working as an LPA since 2009 and have amassed more than 13,000 supervised hours. I work with the same ages, races, diagnoses, etc., and held to the same standards as someone with a doctoral degree or an independent license at the master's level. Personally, it is illogical that a master's level counselor can become independently licensed after 3,000 supervised hours, yet 10,000 hours as an LPA merely places me at the lowest level of supervision I can achieve in my field. Without going back to school for a doctoral degree or attempting to earn a separate license, this is the best North Carolina can offer me and my license, and it is not acceptable.

It is a fact that it is difficult to find employment as an LPA. I've spent tens of thousands of dollars on a higher education, hundreds of dollars to become licensed, hundreds to maintain my license, and it can still take six months to find a job in a highly populated area. Each time I have sought new employment, I have experienced difficulty specifically because I am not licensed at an independent level. Despite my years of education and experience, I am seen as lesser than other masters level mental health and social service professionals. I was once offered a position within a company, only to be told a week later they did not believe they would be able to give me the hours I needed because I cannot work with the main commercial insurance in the area, due to my associate level. I had finally found a place willing to work with my associate level status, yet the reality of financial responsibilities and client accommodations made it impossible for them to hire me. My associate level status makes it difficult to find insurance companies who will contract with me, which directly correlates to the agencies I can work at and the agencies that will hire me, which, also, directly effects my income. According to Ziprecruiter.com, the average LPC in NC will earn \$52,327 a year, while the average income for an LPA is \$49,860 a year. This is at least one paycheck's worth difference for an LPA. This is significant when both degrees have a masters degree in therapy.

Concerning the bigger picture, ongoing supervision is time consuming and financially taxing, especially if supervision is not provided within the agency. Agencies are not always willing and able to provide the supervision, which costs between \$75-\$200 an hour. It is difficult to find time to receive the required supervision during company hours, and not many companies are willing to allow you to leave for personal reasons on company time, even if those reasons are also professional. Agencies also do not like having an 'outsider' involved with agency policies and protected/private information. I worked at an agency that required an outside supervisor go through the agency's own onboarding process, get a background check, and set up an email account specifically through the company. The supervisor refused, which delayed beginning the position with the company and providing services to those who needed them. This means many LPAs continue to search for a job because they cannot get the supervision they need and don't have the support from the companies they work for.

LPAs are being told they don't have enough education and experience to become independently licensed, yet masters level counselors and social workers are able to provide therapy at an independent level, and are able

to work with insurances that an LPA cannot. However, an LPAs education is more rounded for client diagnosis and treatment because they have completed classes in personality and intellectual testing. This is also the education and experience which allows an LPA to perform psychological evaluations, which other fully licensed masters level providers cannot do. It does not make sense for a fully licensed provider to be unable to provide a service that a provider with a 'lesser' license is able to perform. It is infuriating, disheartening, and outright discrimination towards masters level psychologists to consider our education, experience, and passion for our clients as being less significant and less worthy of becoming a fully licensed, independent provider.

Tracie Hector, MA, LPA