

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

SEP 19 2019

**Re: proposed rule change under 21 NCAC 54.2008**

I support the proposed rule changes under 21 NCAC 54.2008 to eliminate career long supervision of licensed psychological associates.

I have been licensed as an LPA since 1984 and have been at Level 3 supervision for many years. I now work with Children's Developmental Services Agency of Western North Carolina as a psychologist doing eligibility evaluations for children birth to three years of age.

I have seen changes to our agency's staffing in the total of nine years I have worked here as a psychologist. I may be the last LPA psychologist hired for our agency – the position I now hold was under consideration to be reclassified to a social worker – social workers can bill for the types of evaluations that we do without mandated ongoing supervision and they can provide treatment. From my perspective of working in this field for many years, the profession of psychology continues to have a great deal to offer the field of early intervention - dealing with the extremely important first 1000 days of a child's life. Infant Mental Health is a blooming field. I would hate to see our agency lose this position and the professional perspective provided by looking through the 'psychology lens'.

The trend of reclassifying psychologist positions is not recent – I noticed this type of reclassification being done and discussed starting many years ago. Other professions have similar supervision of new clinicians, but LPA's career long supervision places an unnecessary burden on already short staffed and busy agencies that they can remedy by reclassifying positions to other disciplines.

I have also taught psychology classes at our local community college and sadly always counseled any students interested in psychology to choose their career path carefully and only consider psychology as opposed to social work or counseling if they intended to get a doctoral level degree because of the need for ongoing supervision where other master's level degrees did not require it. I encouraged them to check on licensure requirements even before deciding on a profession. Requiring ongoing supervision places an unnecessary burden on the professional – any clinician should know by the time they finish their mandated period of post degree supervision for licensure when they should seek additional training or professional consultation from other clinicians. I had a great training program at WCU and excellent supervisors and certainly feel competent to make the decision to seek consultation as needed on my own – just as other professions do.

I also see the need in our rural area for more psychological services. Few doctoral level psychologists work out here at the agencies in our area. Many master's level counselors and social workers provide those services – they can bill similar services without having to obtain ongoing supervision. Again – I hate to see psychology so underrepresented in our population of local clinical professionals.

Please feel free to contact me at the phone number or address below if you have any questions about my opinion in this matter.

Respectfully submitted,

Phyllis Jarvinen, MA, LPA

PO Box 522

Webster, NC 28788 828-226-4902

