

## NO Reply

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**From:** Michael Kirch <mkirch@wakehealth.edu>  
**Sent:** Monday, September 30, 2019 2:25 PM  
**To:** NO Reply  
**Subject:** LPA Supervision issue

09/30/2019

To Whom It May Concern:

I am writing in regard to the NC Psychology Board proposed rule changes addressing supervision (21 NCAC 54 .2008). As I understand, the related rule change would allow LPAs more parity with other master's level practitioners/clinicians in the state of North Carolina, for example, LCSW, LPC, and LMFT degreed professionals.

As a psychologist licensed in NY State since 1999 (inactive) and in NC since 2005 and practicing for over 20 years, I am writing in strong support of the rule changes proposed that would enhance the practice of the LPA clinicians I have known, supervised and worked with in NC and in NY over the years. It is unjust that LPAs are excluded or deemed ineligible for a number of insurance panels (UHC, TriCare, Aetna and Medicare) in addition to being excluded from participation in volunteer activities to include disaster relief with the Red Cross due to not being considered as independently licensed. These limitations are clearly providing an unnecessary shortage of much needed resources for those seeking mental health and psychometric services in NC. In particular, there are also financial variables involved in this decision as LPAs must pay for their supervision out of pocket, compromising their earning potential.

I advocate for removal of the supervision requirement presently in place for LPAs who demonstrate consistent ability to provide quality psychological services per testing and psychotherapy per meeting level 3 competency parameters in order to acquire independent licensure.

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Psychologist



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