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November 3, 2019

Daniel Collins, JD
Executive Director
NC Psychology Board,
895 State Farm Road, Suite 101,
Boone, NC 28607

Dear Mr. Collins,

I am writing in support of the proposed Licensed Psychological Associate (LPA) supervision re-adoptions (21 NCAC 54 .2008).

I am a Licensed Psychologist and Professor of Psychology and Director of Clinical Training at University of North Carolina Wilmington. All opinions expressed in my letter are solely my own and do not represent those of the University or any other individual or group of individuals.

Since 1994, I have had the pleasure of helping to train over 120 master's-level clinical psychologists at UNCW. I have published two articles in APA journals regarding training of master's level psychologists in NC and the professional challenges they face. Finally, I have served as Psychology Supervisor (through the North Carolina Psychology Board) for 19 LPAs over the past ten years. Although I have personally benefitted from fees charged for supervision, I feel so strongly that this pathway to independent practice for LPAs be approved that I am more than willing to argue against my own self-interest.

The rationale for the existing, career-long LPA supervision requirement is a mystery to me. I support the proposed petition/LPA pathway to independent practice and for the following reasons:

1) LPAs are well-trained, competent psychologists who offer valued services to the citizens of North Carolina. There is no evidence to support the idea that doctoral-prepared psychologists are more effective or competent than masters-level psychologists. Unlike other master's prepared practitioners (counselors, social workers), LPAs are trained in the science of psychology, including psychological assessment and the biological bases of behavior.

2) Data indicate that LPA's in North Carolina face undue hardship. While these professionals have scientific and clinical training that far exceeds the training received by counselors and social workers (who can practice independently), LPAs typically pay out of their own pockets for the required supervision. They face a limited job market because agencies often do not recognize or understand the LPA supervision requirement and they are not eligible for some

insurance reimbursement. LPAs who are leaders in this community have even been turned away from professional workshops that deem their license “not the highest level of practice” and so are ineligible for continued training.

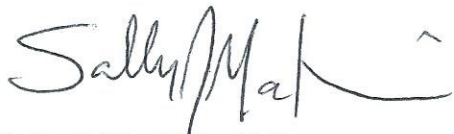
3) The supervision requirement has a discriminatory effect. While doctoral study is out of reach for many who belong to under-represented groups, master’s-level training is more affordable and attracts people from more diverse backgrounds.

4) The current supervision requirement drives qualified individuals away from psychology into fields such as counseling, because of the greater ease of licensure and life-long independent practice and insurance reimbursement options. As a psychologist, I find this to be an alarming trend, especially when North Carolina’s people are facing increasingly severe and complex mental health and substance use challenges. We should be finding ways to incentivize people to pursue psychology training, not penalizing them.

5) LPAs are likely to remain in North Carolina to serve its citizens. In a recent survey of 74 of master’s-level trained clinical psychologists who graduated from UNCW between 1996 and 2016, 76% stayed in North Carolina to practice (MacKain & Noel, in press). This rate is in stark contrast to the 20% rate reported for graduates of North Carolina doctoral programs (Domino et al., 2019).

The existing rules regarding LPA supervision have penalized the very people who have worked so hard to fill the urgent health needs of North Carolinians. Approval of the Licensed Psychological Associate (LPA) supervision re-adoptions (21 NCAC 54 .2008) would clearly show that the behavioral health needs of North Carolina’s citizens come first.

Sincerely,

A handwritten signature in black ink that reads "Sally MacKain". The signature is written in a cursive, flowing style with a long horizontal line extending to the right.

Sally J. MacKain, PhD
Licensed Psychologist #1605