

NO Reply

From: Megan Gabalda <megan@triadkeypsych.com>
Sent: Tuesday, September 24, 2019 9:52 AM
To: NO Reply
Subject: Comment on proposed rule change to NCAC54.2008

To whom it may concern,

I am a doctoral-level psychologist who has been licensed in North Carolina for 11 years. I fully support the proposed rule changes to NCAC54.2008, which would end career-long supervision for highly experienced and appropriately qualified Licensed Psychological Associates.

My support for this rule change is based on a few personal experiences and observations, as well as my understanding of the main argument against the rule change.

I have supervised a highly experienced LPA for approximately one year, and I have worked with several competent LPAs for years. The experienced LPAs I have worked with are well-qualified for independent practice.

Master's level clinicians in other disciplines are practicing independently, often with far less rigorous ethical and educational standards than current LPAs.

One of the main differences between masters and doctoral programs is the focus on research and scholarly activities. In my doctoral education program experience, much of my pre-internship education was spent on research and scholarly activities (collecting data, writing lengthy papers, statistics, teaching, etc.). These experiences did not necessarily prepare me to be a more ethical or qualified clinician. I do not think that spending less time on research and writing lengthy papers would make a master's level clinician less prepared to provide adequate clinical services.

It is my understanding that NCPA opposes this rule change because of potential harm to the public by inadequately educated or trained LPAs. An LPA who has been practicing under supervision for many years, has passed the EPPP at the doctoral-level, and has been recommended by their supervisor for independent practice is likely to be qualified to provide clinical services (within their scope) without presenting a risk to the public. If an LPA at this level is so unethical or unqualified as to present a risk to the public, one hour of supervision per month surely would not be enough to prevent such harm anyway.

For these reasons, I support the proposed rule change to end career-long supervision for highly experienced (Level 3) LPAs. Thank you for considering my opinion.

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