

## NO Reply

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**From:** Melissa Zhiss <melzhiss@hotmail.com>  
**Sent:** Thursday, October 3, 2019 11:10 AM  
**To:** NO Reply  
**Cc:** NCAPP  
**Subject:** Comments Regarding Supervision 21 NCAC 54 .2008

Dear NC Psychology Board Members:

I would like to comment on the current rule regarding Supervision 21 NCAC 54.2008; specifically the career-long supervision of master's level psychologists. I have worked for Mecklenburg County for over 20 years - the majority in the community mental health system and now in the jail and courts. I work with the most vulnerable people in our community- homeless, SPMI with addictions, and IDD who are involved in the criminal justice system. I conduct psychological assessments (free of charge due to my current position with local government) for the Social Security Administration for SSI/SSDI eligible applicants who are incarcerated and cannot attend their consultative examinations. Unfortunately, even when paid, Disability Determination providers will not evaluate an individual at the jail due to the inconvenience of traveling to the facility. I have performed these services for many years due to the lack of professionals willing to perform these duties for individuals who are uninsured, incarcerated, or street homeless.

I came to NC as a young professional with an active Limited Licensed Psychologist (LLP) license from Michigan completing 2 years (2200 or more hours) of supervision, only to learn that I was required to have unending supervision if I wanted to work. Like many others who moved here from another state, I considered getting a Licensed Professional Counselor (LPC) license instead of the LPA. In fact many professionals who could be licensed as LPAs have chosen the LPC instead due solely to the career-long supervision issue. As I get closer to retirement, I have been looking at converting to an LPC myself because I have tried private practice on a part-time basis only to find that it was not worth the effort to only work part-time when I had to pay for supervision on a regular basis, despite being a Level 3. I prefer to work with the most vulnerable individuals in the county and therefore would prefer to conduct evaluations for Social Security and/or Medicaid where there is a great need for psychological testing, but the rates are lower than with private pay or private insurance clients. In Mecklenburg County, the largest county in the state, there is only 1 full-time doctorate level psychologist that I am aware of who conducts Medicaid evaluations regularly. There are a few doctorate level psychologists who will allow 1-2 Medicaid evaluations per month in their practice, due to the lower rates. I cannot say if this issue exists in the rural counties at this time, but when I was conducting psychological evaluations for Disability Determination Services, some individuals had to drive over 40 miles to come to Charlotte to get this evaluation completed. I often spent time with them completing the mileage forms so that whomever brought them could be reimbursed for the mileage. It was truly shocking and I suspect this is still a huge issue for the Social Security Administration.

Within our county government- I know LPAs who have worked 35 years and still require monthly supervision. Some were able to find someone within the organization who agreed to supervise them while others had to pay out of pocket. There's an LPA who was issued his license in 1978....he performs psychological testing for Vocational Rehabilitation ... still requiring supervision 41 years later! He was unable to find anyone to supervise him at different times over 41 years- sometimes paying for several years. The LPAs in public service are struggling even more these days to find appropriate doctorate level supervisors because the state of NC has privatized the community mental health system and most counties have eliminated doctorate level positions. I

fully support an end to career-long supervision and would request that you please carefully consider the proposed changes to these rules. Thank you!

Melissa Zhiss, MA LPA