

September 9, 2019

To: NC Psychology Board att: Daniel Collins

CC: NCAPP att: Janet Heuring-Larsen, MA LPA

From: Patricia VanBuren, MA HSP-PA License #270 or now #0270?

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

I passed my licensing exam in October 1976, at the Practicing Psychologist level, although because my degree was a masters' in clinical psychology I was licensed at the Psychological Examiner level. If you might have noticed my number #270 does not show up on the board website and I was challenged by another supervisor whether I had even had a license until I discovered I had to put a zero in front of my number.

So the past **43** years because of this law I have been required to have supervision by many supervisors who self admittedly had less experience than me culminating in thousands of dollars of supervision fees that were not necessary but required. I could have used that money more wisely by going to trainings that addressed my career choice. Is it sensible or defensible for a PhD with 2 years post doctorate experience to be able to competently supervise a masters' level professional with significantly more experience and expertise? Can they really adequately do this? Yet this is part of the rules of supervision currently in place.

Several times I was turned down for supervision by PhD psychologists because their opinion was they were not qualified to do so especially because of my experience and specialty field of criminal psychology. This necessitated not only finding someone who would supervise me, but also traveling distances for supervision, losing time off work, and filling out countless forms for the psychology board. So more loss of time and money. One time when a supervisor died I was actually told repeatedly by a psychology board staff member that I had to have my dead supervisor signature on a termination form as required. I kept trying to explain he was dead resulting in numerous phone calls and more of my time. I had to laugh when I read the list of factors of the PhD psychologists' organization posted recently protesting the rule change. They seem to have left out their concern they would be losing a "cash cow."

Although I am still working at my age (74), I am also thinking of the masters' level psychologists who still have years to endure this "indentured life time servitude" if this rule is not changed. When is enough, enough? I strongly believe there are moral laws above legal laws and the continuation of this rigid law, in my opinion, is not only unfair but is potentially unethical. Ironically I have paid licensing fees over the years which have perpetuated this rule, perhaps by sins of omission? I have to wonder if anyone has ever considered the loss of potential mentoring/supervision of experienced masters' level professionals who were did not have the opportunity or were hampered in passing on their clinical skills because of this rule?

I support this rule change and hope the board will alter it fairly.