

Pinehurst Neuropsychology

Brain & Memory Clinic

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Daniel Collins, J.D.
North Carolina Psychology Board
895 State Farm Road
Boone, NC 28607

RE: Proposed changes to North Carolina Psychology Practice Act

Mr. Collins,

I am writing this letter as a Neuropsychology practice owner, board certified neuropsychologist and citizen of North Carolina. I employ 10 individuals in Pinehurst, NC for the specialty practice of neuropsychology. We wish to express concern about the proposed changes to the NC Psychology Practice Act listed in the NC Register (Volume 34; Issue 5). I represent four doctoral level psychologists who have achieved or are in the process of obtaining board certification in Clinical Neuropsychology through the American Board of Professional Psychology (ABPP). We are eligible for this distinction based on at least 4 years of graduate education in clinical psychology with specialization in the brain, a one year internship and two year fellowship. This totals at least 7 years of training per person. The time and depth put into our professional preparation is needed to be able to competently provide neuropsychological services.

The proposed changes eliminate the supervision requirement for Licensed Psychological Associates who have met supervision requirements and achieved a passing score on the EPPP after three years. This is unacceptable as clinical neuropsychology is a specialized profession that requires many years of pre-doctoral-level training and post-doctoral fellowship, as stated above.

The practice of neuropsychology has become highly specialized in both the pediatric and adult realms, with clear training requirements having been established via the Houston Conference guidelines in 1998 (see enclosure). Since 2005, a formal two-year post-doctoral fellowship has been required to meet the minimum standards for practice and board certification. Although not required, board certification in neuropsychology has become the common expectation for

individuals working in hospital, government, and private practice settings. No other state that allows the practice of neuropsychology at the master's level. North Carolina would be doing itself a disservice to be the lone state allowing this.

It is also important to note that specific guidelines for the practice of neuropsychology were created because neuropsychologists often serve client populations (e.g., Traumatic Brain Injury; Epilepsy; Alzheimer's Disease) who present with different evaluation and treatment needs than populations typically served by psychologists. For this reason, we collectively oppose the proposed revisions as currently written. Specifically, the current version of the NC Practice Act includes the following statement:

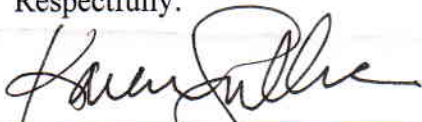
The conduct of neuropsychological evaluations by psychological associates requires supervision. Not requiring supervision are neuropsychological screenings which lead to simple behavioral descriptions rather than clinical interpretations, or the administration of rating devices which may be completed by a variety of professional and non-professional observers and are subsequently interpreted by other parties.

The proposed revision removes this language and would allow for the independent practice of neuropsychology after three years of supervision. We would like to reiterate that appropriate training in neuropsychology is not currently achievable in a master's program, and supervision of an LPA by a clinical neuropsychologist is far from sufficient education and training to allow for independent practice.


The practice of neuropsychology by improperly trained individuals poses great harm to the public and profession. We strongly advise that any revision to the code include language that precludes independent practice of neuropsychology at the master's level regardless of supervision history.

Please reject the proposed changes that would dilute the provision of neuropsychology to the public.


Respectfully.



Karen Sullivan, Ph.D., ABPP



Maryanne Edmundson, Ph.D.



Jenna Renfroe, Ph.D., ABPP



Taeh Ward, Ph.D.