

P.O. Box 2663
Cullowhee, NC 28723
October 25, 2019

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

OCT 29 2019

(also submitted via email: Comments2019@ncpsychologyboard.org)

Re: Proposed North Carolina Psychology Board Rule Change

Dear Mr. Collins:

I am writing in support of the proposed change to 21 NCAC 54 Section .2008(h)(3) that will eliminate the lifelong supervision requirement for Licensed Psychological Associates, if adopted.

I am a Psychologist who has practiced for more than 40 years. I have been a North Carolina-Licensed Psychologist-Health Service Provider for 22 years and have previously been licensed as a Psychologist in four other states. Over the course of my career I have provided clinical supervision to many master's-degreed Psychologists and to many master's-degreed clinicians in other disciplines working in a variety of settings.

While I have found a range of abilities among individuals in each of the disciplines with which I have worked, I can say with certainty that master's-degreed Psychologists as a group are at least equal to and sometimes superior to clinicians of other disciplines in terms of knowledge, skills, and professionalism, including adherence to ethical standards. In particular, Psychologists have a depth of training in assessment that surpasses that of most other disciplines, resulting in better assessments, more accurate diagnoses, and often clearer treatment recommendations than those by clinicians of other disciplines.

Not permitting Licensed Psychological Associates (LPAs) to ever practice independently is a serious restriction on the profession. They are ineligible or at a competitive disadvantage for employment in many settings because most insurance plans will not reimburse them, while reimbursing other master's-degreed clinicians. If they work in settings without Licensed Psychologists, they must obtain supervision elsewhere which can be a logistical challenge and a financial burden. Requiring formal supervision of LPAs beyond their actual clinical need wastes clinical resources that are often scarce, especially in rural areas.

I currently provide psychology supervision to four North Carolina LPAs, each of whom has practiced psychology for more than fifteen years. Fortunately, our employer covers my time to supervise them, and our monthly supervision is a pleasant experience for me. However, I know that each is as capable as other master's-degreed clinicians in our organization to practice independently, in part because, like any good clinician, each knows when to seek consultation or supervision whether or not it is required by their licensure status.

I am sad to admit that when asked by individuals considering going into one of the helping professions what discipline I recommend, I urge caution in considering psychology unless committed to earning a doctoral degree because of the restrictions placed on LPAs in North Carolina and many other states. I look forward to being able to change my recommendation when our profession recognizes LPAs as the qualified professionals that they are, fully capable of practicing as independently as clinicians in other disciplines.

I have carefully reviewed the proposed rule changes that would allow North Carolina LPAs to eventually practice independently after a period of at least three years of supervised practice and with the recommendation of their supervisor who has sufficient experience to know their readiness to practice without mandatory supervision. I strongly encourage the Board to adopt the proposed rules in Section .2008(h)(3). I understand that some Licensed Psychologists oppose LPAs ever being allowed to practice independently, but I think that restricting the independent practice of psychology to doctoral-degreed individuals is motivated more by perceived competition with psychiatry than any valid evaluation of the actual competence of LPAs.

Sincerely,

A handwritten signature in dark ink, reading "Stephen P. Puckett". The signature is written in a cursive style with a large, stylized 'S' and 'P'.

Stephen P. Puckett, PhD, LP-HSP
NC License #2334