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Clinical & Forensic Psychology

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Mr. Daniel Collins  
North Carolina Psychology Board  
Submitted via email  
to [Comments2019@NCPsychologyBoard.Org](mailto:Comments2019@NCPsychologyBoard.Org)

re: Proposed 21 NCAC 54.2008

Mr. Collins, and Ladies & Gentlemen of the Board:

I am writing to express deep concern over the Board's proposal to create the possibility of the independent practice of psychology by some Licensed Psychological Associates.

As you will recall, following the *White v. NC State Board of Examiners* decision, the psychologists and legislators of this state had to draft a new Psychology Practice Act. Dr. Burlingame asked me to work on the Ad Hoc Committee that prepared a draft law to submit to the General Assembly. I served as that group's secretary, drafting and re-drafting the multiple versions that we discussed in depth over the years.

As best as I can recall, the group never anticipated any fully independent practice of psychology by Licensed Psychological Associates, at least within the realm of what we usually call "clinical" psychology. We carefully wrote definitions regarding personality assessment, neuro-psychological testing, counseling, and other therapeutic measures to insure that the public was protected through appropriate supervision. We added language so that, if new psychological techniques outside of these definitions were developed, these would be supervised appropriately as well. At no point did we imagine that the scope of supervised practice would shrink or even vanish, as our vision was that, if anything, the knowledge base of psychology would expand and require more rather than less study and training for safe, appropriate services to the public.

The proposed regulations, in my view, far exceed the intent that was written into the Psychology Practice Act that you now administer. Put simply, I think the proposed regulations are inconsistent with the statute. I urge you to reconsider this proposal.

Respectfully,

*Richard Rumer, Ph.D.*

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