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NC Psychology Board  
895 State Farm Road  
Suite 100  
Boone, NC 28607

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RE: Proposed Rule Change under 21 NCAC 54.2008

I am writing to share my wholehearted and unequivocal support of the proposed rule change under 21 NCAC 54.2008, amending the supervision requirements for North Carolina Licensed Psychological Associates.

I have been an LPA for 37 years. Early in my career I was a credentialed provider in most insurance networks, as the requirement for independent licensure had not yet been instituted. When this requirement went into effect, I received notice that I had 30 days to secure independent licensure or be dismissed as a provider. Obviously, that was impossible, and I was summarily dismissed from many networks, including United Health Care and Champus (now Tricare). My clients had 30 days to find another provider or pay for their care out of pocket. I did not feel this was fair or equitable, so I adjusted my fee to make my services more affordable. Many left however, as even my adjusted fee was out of their reach. Over the years, medical professionals and former clients have made referrals that I could not accept as I was ineligible to be in their insurance network solely because I did not have an independent license, and they could not afford to self-pay. This has limited client's choice and hurt my practice.

Several young, aspiring mental health professionals have sought my guidance as to what course of study to pursue in graduate school in order to work in private practice. Unless they were prepared to obtain a Ph.D., I have always recommended they explore social work or counseling, because they would be forever limited by the master's degree in psychology despite, in my opinion, being better trained. A childhood friend of my 35-year-old daughter asked my advice. She is now a licensed clinical social worker, practicing independently, with barely 6 years' experience, while I, with 37 years' experience, am still required to be supervised. To me, that is ridiculous.

I sincerely hope you will adopt the proposed changes to the supervision requirements. These changes will allow LPA's to be recognized for their level of expertise and the services they already provide to the citizens of North Carolina. These changes will give them the opportunity to practice their craft without the hardship of career long supervision, provide them the opportunity to be accepted into more insurance networks, and provide equitable treatment among other master's prepared professionals.

Respectfully,

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Cc: NCAPP