

6238 Dwayne Starnes Drive
Hickory, NC 28602
November 01,2019

North Carolina Psychology Board.
895 State Farm Road, Suite 101
Boone, NC 28607

Re: 21 NCAC 54.2008

Dear Board Members,

I am writing in support of rule change 21 NCAC 54.2008. I have been a Licensed Psychological Associate since November 1997. My credentials were widely recognized and accepted by consumers and insurers. However, the supervision requirement has allowed insurers to “discriminate” against those of us with a Master’s degree in psychology. Other disciplines that did not even have licensure within North Carolina (clinical social work and counselors) have encroached upon the provider network. Despite having thirty-two years’ experience, I have observed that persons who possess L.C.S.W or LPC credentials are more “hirable”. No amount of specialized training can overcome the limitations that the supervision requirements put on LPA’s. I have known psychologists with Master’s degrees who came to North Carolina from other states that sought licensure in other disciplines (counselor) to avoid the limitations imposed by 21 NCAC 54.2008. I know other Licensed Psychological Associates who have “defected” from our discipline and sought credentials under the NC Board of Licensed Professional Counselors. This only serves to weaken our discipline and unfortunately reduces the full array of services (testing and treatment) that can be provided by psychologists to those persons with mental health needs.

Years ago, Charles C. Mitchell, Ph.D. told me that the supervision requirements were enacted to ensure that doctoral level psychologists would maintain control of their employability as they feared being replaced by Master’s level providers who might work for less salary/wages. He assured me that no genuine thought was given to the safety of consumers of mental health services. I have had the good fortune to receive supervision from Licensed Psychologists who see me as their peer. I have also had the misfortune of meeting newly Licensed Psychologists who quickly inform me that no amount of experience will ever take the place of their superior training and of Licensed Psychologists who can only offer “that’s a tough one” when asked to provide ethical / treatment recommends during supervision/consultation. Licensed Psychologists who possess this mentality do nothing to “protect the public” let alone provide meaningful and useful supervision. I hereby urge you to consider rule change of 21 NCAC 54.2008 to allow those of us (LPA’s) to maintain our relevance in the workplace and provide services to consumers.

Sincerely,

Gregory Shugar, M.A.
Licensed Psychological Associate # 1198