

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

September 1, 2019

Dear Board Members:

I am writing in support of the petition to the Board submitted through Everett, Gaskins, Hancock, LLP, for the purpose of eliminating career-long supervision of Licensed Psychological Associates. I attended the presentation of the petition to the Board, and I am in agreement with the rationale for rules change presented in the petition.

My position on this issue derives from experiences related to this topic over the past 30 years. I was first licensed by the Board in 1983 as an LPA. I began supervising LPAs under an Alternate Supervision agreement in the late 1980s. Subsequent to receiving my Ph.D., I was licensed as an LP in 1992, and began supervising LPAs in this capacity at that time. Over the past 28 years, I have supervised dozens of LPAs, ranging in experience from newly licensed to seasoned practitioners. Additionally, I served on the Psychology Board for 9 years from 1997 until 2006 during which time I reviewed applications for licensure by perspective LPAs, applications for reduced supervision, and ethics complaints. My experience in reviewing ethics complaints is supportive of the petition insofar as I recall no significant difference in the frequency of complaints made toward LPAs in comparison to LPs, suggesting that LPAs present no greater risk of harm to the public than do LPs.

Having read the petition to the Board, I find the arguments persuasive. Consistent with my experience, I would concur that most of the LPAs I have supervised over my career could function independently as competent and ethical practitioners after the equivalent of 3 or fewer years of full time supervision.

I believe that a compelling argument for LPA independent practice can be made from consideration of the 4 elements of supervision found in 21 NCAC 54 .2002 (a).

Element (1) is consideration of ethical, legal and professional standards. It appears to me that after 3 years of competent supervision and a cycle of continuing education which requires Category A hours in legal and ethical issues, an LPA should have acquired experience in this area equivalent, at minimum, to that of a newly licensed LP who does not require supervision. It would also appear to me that when an LPA fails to practice according to ethical, legal and professional standards after 3 years of competent supervision he or she should be scrutinized by the Board to determine if the person is competent to practice at all.

Element (2) is technical skills and competency. Again I would argue that 3 years of supervised experience with a competent supervisor, along with appropriate continuing education should establish a level of proficiency equivalent, at minimum, to that of a newly licensed LP. If this is not the case, however, the LPA's deficiency should have been established through supervisor ratings over this period and can be addressed by continuing supervision, which would preclude the reduction of supervision through existing processes.

Element (3) is supervisee's utilization of supervision. Supervisee's who do not adequately use supervision should not be advanced through the reduced supervision process. This element becomes superfluous when the LPA advances to independent practice.

Element (4) is supervisee's ability to function independently, or with reduced supervision. As supervisee's are routinely rated by their supervisor, the essential work in determining if an LPA is prepared for independent practice is already completed through routine supervisor ratings. This element also becomes superfluous when the LPA advances to independent practice.

Having expressed my opinion in support of independent practice for LPAs, I would like to comment on some of the arguments made against the petition, specifically those made by the NCPA subcommittee on LPA issues. First, let me say that I am a member of NCPA, however I will likely not renew my membership because of the manner in which the subcommittee failed, in my view, to respect the opinions of the LPA membership, particularly those on the LPA Task Force (on which I participated), and who argued in favor of the petition.

NCPA's first argument is that there are currently no national standards and an accreditation process for master's level programs in health services psychology, as there are for doctoral level programs. This is true, and in fact, until recently the APA was vested in having Psychology become a doctoral only field of practice. But, thankfully, the APA has realized that the former position would drive Psychology completely out of the provision of therapy as these activities are increasingly undertaken by other mental health professions that license therapists at the master's level. While APA is late to the party, I am pleased for this about-face, and I would suggest that they look to North Carolina for guidance in how they might structure master's licensure. But I find NCPA's argument against the petition citing the APA's efforts to be disingenuous. APA accreditation standards for MA programs will be a welcome thing when it finally happens. It will inform the standards that the license board uses to set criteria for training for **future** licensees. And, like the standards for LPs, the Board may well recognize both applicants from accredited programs and non-accredited programs. It is likely that the Board will also be informed by the work of the National Association of Psychology License Boards which proposes model licensing acts that states may adopt. This is all good news for the future, but I personally see no relevance to the current question of supervision rules for LPAs in NC.

NCPA's second argument discusses the legality of making the proposed changes via the rules process. I have sufficient confidence in the Board's attorney to assume that this question has been answered, and if after further review, a change in statute is found to be needed, I hope that the Board would support such a change. I would also hope that if a statute change were required, that NCPA would not use its lobbying arm to oppose it.

Thank you for considering my opinions. I wish you success in this endeavor.

Sincerely,

A handwritten signature in black ink, appearing to read "Thomas J. Thompson".

Thomas J. Thompson, Ph.D.  
Licensed Psychologist