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Daniel Collins, J.D.
Executive Director
N.C. Psychology Board
895 State Farm Road, Suite 101
Boone, NC 28607

Dear Mr. Collins,

I appreciate the opportunity to comment on the recently proposed rule changes. I have been licensed in North Carolina at the doctoral level since 1982. I am a former member and chair of the North Carolina Psychology Board, and I am a former president of the North Carolina Psychological Association.

To my knowledge, nobody has ever previously understood current language in the NC Psychology Practice Act to indicate that the Board could unilaterally move forward to discontinue all supervision of LPAs.

In addition, I do not believe that LPAs who are unable to pass the national licensing exam (EPPP) at the level defined for minimal competence should ever be allowed to practice without supervision. The regulatory umbrella group that oversees the licensing exam (ASPPB) has consistently defined 500 as the minimal level to be considered competent in the academic foundation for professional practice as a psychologist. I can see absolutely no reason why we would provide a pathway for LPAs to provide unsupervised practice to the public if they are unable to demonstrate minimal foundational academic competence. Additional supervision does not reasonably substitute for a sufficient academic foundation.

Because of my extensive involvement with psychology education and training at the national level, I am very familiar with the current process to develop an accepted national standard for masters-level training in psychology and an accreditation process that is designed to ensure that specific programs meet this standard. This process is moving forward quickly and I believe that we will have a national standard, accepted scope of practice, and an accreditation process for masters-level psychology programs in the next few years. Waiting until this process is complete will ensure that North Carolina enacts appropriate standards for masters-level practice to protect the public.

Submitted with respect,

Erica H. Wise, Ph.D.