

1801 Madison Ave.
Greensboro, NC 27403
October 16, 2019

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Daniel Collins, Executive Director, and Members of the Board
North Carolina Psychology Board
895 State Farm Road, Suite 101
Boone, NC 28607


Dear ~~Mr.~~ Collins and Members of the Board:

I write in support of the proposed rules changes in 21 NCAC 54 .2006 and .2008. As you are well aware, the requirement for supervision of Licensed Psychological Associates (LPAs) has been one that has concerned LPAs for many years. LPAs, in addition any number of licensed psychologists (LPs) in the state, have long considered the requirement that LPAs be supervised for most activities in the practice of psychology to be an unnecessary burden which is time consuming, of limited need as the LPA becomes skilled in the profession, and, in many cases, overly expensive. It is to the Board's credit that it is proposing a path to independent licensure free of required continuing supervision for LPAs who meet certain requirements, none of which should be considered overly taxing for LPAs seeking independent status.

Several years ago, I was involved with the joint NCAPP/NCPA task force that was working to modify the North Carolina Psychology Practice Act in such a manner that it would provide for independent practice for LPAs. The proposed price for independence for LPAs was, however, based on the eventual termination by statute of the license, "Licensed Psychological Associate," for anyone who did not meet the requirements for this license by a certain date. After struggling philosophically for some time with assisting the task force with writing the language for such a change in statute, I decided that I could not abide the notion that individuals, who may be highly qualified to provide psychological services to residents in our state who needed such services, would no longer be able to become licensed to do so. As a consequence, I ended my involvement with the task force and informed the members that I could not, in good conscience, continue to support such efforts. I have never regretted that decision, and am very pleased and gratified to see that NCAPP initiated the process of having the rules for LPA supervision examined by the Board and that the Board is supporting the rules changes in the manner which is occurring.

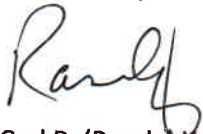
While wholeheartedly supporting the proposed rules changes as written, I believe it is important to address an issue in relation to the delivery of health services by LPAs. Under statute N.C.G.S. § 90-270.2(b), "any licensed psychologist . . . who provides or offers to provide health services to the public *must be* (emphasis added) certified as a health services provider psychologist (HSP-P) by the Board." Further, under N.C.G.S. § 90-270.2(c), a "licensed psychological associate . . . *may be* (emphasis added)

granted certification as a health services provider psychological associate (HSP-PA)." As a point of historical reference, I served on the NCPA ad hoc Licensing Act Task Force that drafted such language appearing in the current statute and recall quite distinctly the discussions that the task force members had at the time about *requiring* LPs who provided health services to hold HSP-P while providing *permissive* language for LPAs with regard to being certified as HSP-PAs. At that time, in the early to mid-90's, such a lack of requirement for LPAs to hold HSP-PA was based on the assumption that LPAs would be required to have supervision for as long as they were licensed by the Board. Given the nature of the changes that are currently under review, I propose that, in order for any licensed psychological associate who provides health services and who wishes to become independently licensed in the manner set forth in rule, he or she must apply for and be granted status as an HSP-PA as set forth in Rule .2706.

Providing for independence for LPAs now brings psychology in line with other licensed mental health professionals who provide services in this state. Although psychological practice is similar in many ways to that of other mental health professions, the practice of psychology is distinct with regard to its scope and sequence of training, ethical standards, and research requirements, among others. Allowing for independence through relative parity with other licensed mental health professions in North Carolina will likely promote growth in licensure numbers, which will inevitably serve to enhance the quality and nature of psychological services across the state.

Finally, I wish to commend the members of the Board and the Board staff for your willingness to receive and review NCAPP's proposed changes in rule. Making the changes which you have initiated is a bold move on your part, and I thank you for your willingness to do so. I sincerely believe that the ultimate effect of these changes will be to serve the public in North Carolina by expanding the availability of qualified psychologists throughout the state.

Respectively,

A handwritten signature in dark ink, appearing to read "Randy", with a stylized flourish at the end.

Carl R. (Randy) Yardley, M.A.