September 23, 2019

To: Daniel Collins

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

In reference to: Proposed rule change under 21 NCAC 54.2008

This letter is in support of the proposed rule change under 21 NCAC 54.2008. My name is Jayme Yodice and I am a Licensed Psychological Associate and a Health Services Provider-PA in Charlotte, North Carolina. I have been licensed in North Carolina for 18 years.

Before I express my point of view, I want to take a moment to express gratitude for my training at Appalachian State University, where I received by BA in Psychology and MA in Health Psychology. I had superb professors and mentors there and I believe I received top notch training. I also have had the pleasure of working with many Licensed Psychologists over the years who have provided great supervision and mentoring.

I have been waiting for many years to be unburdened by mandated supervision. Currently, I am at the highest level (Level 3, which correlates to supervision once per month). I have sought out the best psychologists to receive supervision from and tried to accept this rule as being part of being licensed. However, I have experienced and continue to experience much frustration over the years with this rule. I feel it is easiest to bullet point these below.

- At a certain point in my career, I became the experienced one and I began to find that my supervisors were either close in age or experience to me or that I had even more experience or expertise than they did. On a few occasions, working in agencies, I found them to be inadequate. My solution was to seek out better supervision and pay for it on my own, rather than relying on what was offered through my employer. What I found is that some LP's do not want to provide supervision due to the increased liability, which leaves us searching for someone with a good reputation who is willing to provide supervision.
- I was not accepted to various insurance panels due to not being "independently licensed." When I opened my private practice in 2013, this was a huge barrier. I also got a letter once from an insurance company where they expressed a denial for a service due to my

- not being "allowed" to provide it. This was related to not being "independently" licensed in the state. I also had to attempt to explain this to the client.
- Working with other MA level clinicians has been very frustrating and brings about negative feelings one cannot quite describe. LCSW, LPC, and LMFT therapists are allowed to work independently after a relatively short period of time. And in my experience, many do not have the same level of training that we do as LPA's. They also often launch into private practice or other endeavors that allow them more freedom and more opportunity to earn higher salaries.
- I have been limited in the purchase of psychological testing materials even though I am licensed and trained to provide those services. Pearson told me directly this is related to our having to have supervision and not being "independent practitioners."
- Being mandated to go to supervision once a month is contrived. I compare it to if someone were forcing you to attend therapy, when you did not feel you needed it. At a certain point in your career, supervision or clinicial consultation should be something you do naturally, when needed. Seeking consultation should be taught, encouraged and expected, not mandated. The money I spend on supervision would be better spent on training and supervision directly related to that training. Example: I got extensive training in ACT and would prefer to pay for some short-term supervision for ACT.
- Lastly, the rule is outdated. I agree that anyone early in their career should have some level of supervision but as I sit here in my own office, 18 years after becoming licensed, I wonder how this is still in place. I have been puzzled by the reality that I could supervise interns who were obtaining their MA but after they finished internship, I was no longer deemed appropriate to train or supervise them.

I am passionate about my work with clients and colleagues and have built excellent relationships in my community. I would like to complete my career without this added burden and put that time and money towards the best quality training and consultation, when needed.

Sincerely,
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