

Harbor Psychological Services, PLLC

P.O. Box 2707
211 N. Market St., Suite B
Washington, NC 27889

October 31, 2019

Re: Proposed rule change under 21 NCAC 54.2008

To Whom It May Concern:

I am writing in favor of granting Masters level psychologists independence via the proposed rule change under 21 NCAC 54.2008. I have worked in clinical practice as an LPA in North Carolina for 23 years. The LPA life-long supervision requirement has damaged not only the psychology profession as a whole, but also the clients we claim to serve.

Life-long supervision limits my insurance participation and imposes disproportionate costs compared to independent providers such as LCSWs or LPCs. When I combine supervision fees with lost work time, supervision costs me up to \$5000.00 per year. If I work until age 65, the career-long cost could exceed \$200,000.00.

Qualified supervisors are also getting scarce. As more LPs retire, it's hard to find LPs comfortable supervising someone with my years of practice experience. The scarcity of LPs creates ongoing career instability for LPAs, especially in rural areas.

Our biggest concern, however, should be the declining quality of North Carolina's mental health services. NCPB's short-sighted focus on LPA restrictions contributed directly to this decline. NCPB stood silent while other disciplines encroached upon the practice of psychology, diluting it so much that now, anyone with a slightly related Master's degree can practice independently with far less training and oversight than LPAs.

For example, for fiscal year 2017-2018, Medicaid psychotherapy code 90834 could be billed by an LCSW, LCAS, LMFT, and LPC, for the same reimbursement rate as an LPA. In fact, psychological testing is the only clinical service reserved for psychologists in the Medicaid service list. Not surprisingly, those other providers have proliferated while psychologists languished. In rural areas where Medicaid is a primary payor, this trend has a tremendous impact on service quality.

Not only do clients complain of bad service from these providers, many service records I review reflect alarmingly poor clinical understanding. I cannot understand why NCPB turns a blind eye to those providers functioning independently, yet does not have confidence in its own LPAs to do the same.

Since other licensures are more attainable than practicing psychology at any level, true psychological services dwindled. The few psychologists in my area have long wait lists. Given that psychological testing is now the only service separating us from other mental health providers, referral sources find it easier to work around us than refer to us. It's only a matter of

time before agencies remove psychological evaluations from their eligibility requirements, making all psychologists, not just LPAs, obsolete.

Finally, life-long supervision is simply illogical. I passed the licensing exam at the PhD level. While I've been fortunate to have excellent supervisors, after 23 years, supervision is qualitatively no different from any other collegial consultation. So, while it offers no new training nor significantly alters my practice, it puts me at a substantial disadvantage against other, less trained providers.

Effective supervision should produce a confident, independent practitioner. If supervision cannot accomplish this in 3 to 5 years, what does this say about the quality of training and supervision LPs provide? If LPAs are truly not competent to function independently after this time frame, we have only LPs to blame.

Compared to other professionals who practice independently in NC, the life-long LPA supervision requirement is arbitrary, unfair, and, frankly, damaging to the psychology profession as a whole. I urge you to approve independent status for LPAs as detailed in the proposed rule change. Choosing otherwise threatens the continued viability of psychology practice in NC, and that hurts us all. Thank you for your consideration.

Sincerely,

A handwritten signature in cursive script, appearing to read 'T. Stevens'.

Tamara L. Stevens, MA, LPA, HSP-PA
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