

October 29, 2019

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

Dear Members of the North Carolina Psychology Board,

I am writing in support of the proposed amendment changes to 21 NCAC 54 .2008 (h) (3), which will grant Licensed Psychological Associates (LPAs) the opportunity to become fully licensed in North Carolina.

Over the past 25 years, I have supervised a total of six LPAs, three of whom I am currently supervising. It is my strong professional opinion that they all were and are qualified to be independent practitioners.

Sadly, and unfairly, because of their licensing status, LPAs have been limited in providing psychological services to insufficiently served groups such as the elderly and military personnel and their families in NC. Because they cannot be independently licensed, they cannot be reimbursed under Medicare which limits the availability of their services with the elderly. Similarly, they have been prevented from providing mental health treatment to U.S Armed Forces military personnel, military retirees, and their dependents since they are not recognized as independent mental health providers by Tricare, the civilian military health care insurance.

LPAs status of being relegated to a substandard license status has greatly diminished the availability of skilled mental health services to people in NC that desperately need available mental health providers.

As a member of the North Carolina Psychological Association (NCPA), I have never supported their position of limiting the license status of LPAs. NCPA frequently advocates for the victims of injustice in our state and the licensing status of LPAs is clearly an example of an injustice that deserves correction. Therefore, I have been puzzled by the insensitivity with which NCPA has treated our colleagues with master's degrees in psychology.

NCPA makes the argument of wanting to protect the public from unsupervised master's level psychologists, but I am not aware of their ever going on record to protest the independent licensing of master's level counselors or social workers. I would argue that many of the latter providers don't have the depth of training as someone who has a Master's degree in clinical psychology.

The revised psychology licensing law provides excellent safeguards to the public with the educational requirements for both levels of practitioners. And the new proposed requirements for PhDs who provide supervision to LPAs (during the required time that they are supervised) will help ensure that LPAs are receiving the type of supervision that they need for the specific work that they are engaged in.

I am grateful to the North Carolina Psychology Board for addressing this long-term unfair licensing status for master's level psychologists who have (or will have) the required training and experience to provide excellent clinical psychological services.

Sincerely,

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