

Comments to the N.C. Psychology Board  
Proposed Rule Changes to Supervision and Continuing Education  
N.C. Association of Professional Psychologists

As the organization representing the state's Licensed Psychological Associates (LPAs), we read the proposed rule changes regarding mandatory training for supervisors and modifications to continuing education with caution and concern. These proposed rules would have a significant impact on our membership, their livelihood and their service to the community.

We have shared the Board's information on these rules with our members and solicited their feedback. We have held focus groups throughout the state; we have talked to our colleagues; we have sent e-mails; and we have posted information on our website. It is our privilege to submit their input to you, and we hope that you will give it due consideration as you develop these rules.

### **Mandatory Training for Supervisors**

We can all agree that additional training is generally positive. However, as LPAs, we have serious concerns that mandatory training for supervisors will further diminish an already limited pool of supervisors. Already burdened by liability issues, Licensed Psychologists could cease providing supervision entirely, making it even more difficult to find a supervisor, especially one who is geographically accessible and who has relevant experience. We have heard anecdotally from several current supervisors who have stated that the addition of training would cause them to stop providing that service. In addition, the costs of training will likely be passed on to LPAs, adding yet another expense of supervision. We also have concerns about the timing and implementation of the proposed rule. Specifically, there are only 16 months for supervisors to receive training; if they fail to do so in time, an LPA may be left in a difficult situation, without appropriate supervision and unable to work.

Our members also raised questions about whether the training will, in fact, increase compliance with Board rules. One LPA stated that her supervisor objected to the idea largely because the current educational offerings on supervision are not helpful. The topics are narrowly focused and often irrelevant to her work. Our members suggested several possible alternatives to the proposed mandatory training, including simply highlighting the problem areas in Board publications and communications rather than requiring training. Members also suggested that training for supervisors be handled like Category B continuing education units. Educational packets would be sent through the mail or provided online and then LPs would complete a test for certification. If supervision and the proposed training ARE simply to ensure that rules and ethics are followed, then perhaps training on these issues should be provided to all psychologists through the continuing education programs.

The Board must recognize that supervision is making LPAs increasingly unemployable, threatening their ability to provide services to their clients and to make a living. The Board's rigid interpretation of the supervision rules, as in the scenario described recently for a supervisor on extended vacation, make the situation even more challenging. It has long been the position of this organization that LPAs should have parity with other master's level providers and that progress should be made toward eliminating lifetime

supervision. While that remains our priority, there are actions the Board can take immediately to reduce the burdens of supervision. First, LPAs should have access to a database or registry of potential supervisors with information on location and practice area. This type of database would facilitate the search for supervisors, creating a more standard process for beginning the relationship. Technology should also be used to improve supervision. Video conferencing technologies like Skype should be considered a viable means of supervision. This would allow supervision relationships to exist even if the two parties are separated geographically and would allow LPAs to continue supervision with LPs who have retired and left the area. Supervision could also be counted toward continuing education hours, to reduce overall costs for LPAs. To increase the pool of supervisors, the Board could expand the opportunities for LPAs to serve as supervisors.

We would also ask the Board to consider an additional supervisory level, a Level 4. An LPA would be eligible for this level after having achieved Level 3, worked for an additional one year and have had no complaints to the Board or lawsuits. At Level 4, an LPA would receive supervision as needed and at least once a year.

The Board must seriously consider the future of supervision – and the future of LPAs – as it considers this proposed rule.

### **Continuing Education**

Generally, our membership is supportive of the idea of expanding continuing education credits. However, some have raised questions about the evidence linking an increase in hours to protecting the public. Our members questioned whether the requirements of other states – in and of itself – were relevant to North Carolina.

However, there were significant concerns about the elimination of Category B CEUs. Our members worried that this would increase the costs of continuing education, forcing them to travel more. In addition, some specialty areas such as play therapy or working with cardio patients may not have APA accreditation but are still educational opportunities of value. Members also wanted to maintain access to workshops accredited in nearby states but not in North Carolina. We believe that Category B CEUs should be modified and limited rather than eliminated altogether.

Thank you for your attention to these comments and concerns. The leadership of NCAPP looks forward to continuing to work with you to promote the knowledgeable, ethical and legal practice of psychology in North Carolina.