

Delonica Rochelle Rogers
287 Dorado Street
Gainer, NC 27529

03/18/2021

N.C. Rules Review Commission
6714 Mail Service Center
Raleigh, NC 27699-6700

Re: 12 NCAC 09B .0101 and 12 NCAC 09G .0205

Members of the Commission:

My name is Delonica Rogers, and I am the Quality Control & Resource Planner for The FMRT Group. As an African American woman with both professional and personal interests in the employment of correctional officers and juvenile justice officers, I believe proper psychological evaluations to be invaluable to the Department of Public Safety as a whole. Having the opportunity for every applicant to interview with a clinical psychologist prior to being employed can help DPS identify potential difficulties with cognitions, detect emotional reactivity, and understand an applicant's assets and vulnerabilities, all vital to employment in public safety.

I request that the above rule(s) be reviewed in the upcoming legislative session as set out in N.C.G.S. 150B-21.3. I further request that the rule(s) be subject to a delayed effective date as set out in that same provision.

Thank you for your consideration.

Delonica R. Rogers

A handwritten signature in black ink, appearing to read "Delonica R. Rogers", with a large circular flourish at the end.

Scott Stubenrauch, Psy.D., BC-TMH, BCTP, DPP
12897 Klappa Drive
Lemont, Illinois 60439

March, 17, 2021

N.C. Rules Review Commission
6714 Mail Service Center
Raleigh, NC 27699-6700

Re: 12 NCAC 09B .0101 and 12 NCAC 09G .0205

Members of the Commission:

My name is Scott Stubenrauch, and I am a clinical psychologist licensed in many states including North Carolina. I am double Board Certified in telehealth practices and am a Diplomate in Police Psychology through the Society of Police and Criminal Psychology, presently serving as the Diplomate Committee Chair. I am also uniquely qualified to speak to this issue given my employment as a Chief Psychologist in the test publishing industry.

Making employment determinations in public safety and related high-risk occupations, based on written assessments measuring personality and/or pathology, without a clinical interview to corroborate/reconcile assessment data, consistently goes against test publisher recommended practices. Interviews allow for the opportunity to contextually interpret meaning of assessment scores, which is critical to more fully assess the job suitability of the candidate undergoing evaluation. Not including a clinical interview in such evaluations, conducted by a licensed psychologist or other qualified professional, is arguably a negligent practice and impairs the defensibility of the hiring decisions made from incomplete psychological evaluations such as those relying only on assessment data to determine a candidate's suitability.

I request that the above rule(s) be reviewed in the upcoming legislative session as set out in N.C.G.S. 150B-21.3. I further request that the rule(s) be subject to a delayed effective date as set out in that same provision.

Thank you for your consideration.

Scott Stubenrauch, Psy.D., BC-TMH, BCTP, DPP

Scott Stubenrauch, Psy.D.

COMPLEX PSYCHOLOGICAL EVALUATIONS
DBA JOHN F. WARREN & ASSOCIATES, PA

CLINICAL PSYCHOLOGY
MEDICAL PSYCHOLOGY

FORENSIC PSYCHOLOGY
NEUROPSYCHOLOGY

February 17, 2021

N.C. Rules Review Commission
6714 Mail Service Center
Raleigh, NC 27699-6700

Re: 12 NCAC 09B .0101 and 12 NCAC 09G .0205

Members of the Commission:

By profession I am a North Carolina licensed Physician Assistant and North Carolina licensed psychologist, and by specialty I focus on occupational/family medicine and police/forensic psychology. I have been actively involved in the evaluation and selection of safety-sensitive employees (police, detention, fire, EMS) for over 30 years. In addition, I've been active in state and national professional associations related to these professional and medical services.

The above rule(s) reflect a significant departure from professional and medical standards. The process in which the rule(s) were developed resulted arose from a departure from North Carolina administrative law standards regarding the psychological screening of correctional officers, and resulted from a sub-committee process that was flawed on many levels.

I request that the above rule(s) be reviewed in the upcoming legislative session as set out in N.C.G.S. 150B-21.3. I further request that the rule(s) be subject to a delayed effective date as set out in that same provision.

Thank you for your consideration.

John F. Warren & Associates, PA



John F. Warren, III, Ph.D., PA-C

Licensed Psychologist (NC #0871)
Physician Assistant — Certified (PA-C)
Board Certified Forensic Psychologist (ABPP)
Board Certified Police and Public Safety Psychologist (ABPP)

JFW/

Christopher A. Baker, Psy.D.
1700 Lombardy Circle, Apt. D
Charlotte, NC 28203

March 17, 2021

N.C. Rules Review Commission
6714 Mail Service Center
Raleigh, NC 27699-6700

Re: 12 NCAC 09B .0101 and 12 NCAC 09G .0205

Members of the Commission:

My name is Dr. Christopher Baker; I am a licensed clinical psychologist in North Carolina (#5048). I have closely followed the process by which this new rule is proposed and find it incredibly disheartening because of the potential damage it may incur upon DPS staff, the citizens they serve, and the state as a whole. Numerous and lengthy rationales have been provided to the relevant decision-makers as to why this proposed rule is so ill-advised, and if that information has not reached you please feel free to contact me to discuss this matter. Consider one damning piece of information that highlights how poorly-considered this new rule is: to my knowledge, throughout the entire decision-making process, including multiple sub-committee and committee hearings, not one clinical psychologist or psychiatrist has spoken in favor of this proposed rule. In fact, the one clinical psychologist who is involved in this decision-making process made her thoughts known as to why this proposed change should not move forward, only to be ignored by committee members who have no legal ability to provide the type of psychological screening examinations being debated. That is outrageous. North Carolina should not be a state in which non-scientist policymakers ignore the advice of all relevant scientists in a given decision in order to pursue agendas based on cost or convenience; that seems to be what happened in this case.

I request that the above rule(s) be reviewed in the upcoming legislative session as set out in N.C.G.S. 150B-21.3. I further request that the rule(s) be subject to a delayed effective date as set out in that same provision.

Thank you for your consideration.

Christopher A. Baker, Psy.D.



Jennifer Beauchamp
1058 Autumn Drive
East Bend, NC 27018

March 17, 2021

N.C. Rules Review Commission
6714 Mail Service Center
Raleigh, NC 27699-6700

Re: 12 NCAC 09B .0101 and 12 NCAC 09G .0205

Members of the Commission:

It is my belief as a tax-paying citizen that anyone in a safety-sensitive position of authority over another person, especially those responsible for overseeing juveniles, inmates, and the general public, should be required to undergo a comprehensive psychological evaluation, which includes a battery of testing as well as a clinical interview with a doctoral-level psychologist, prior to being hired.

I request that the above rule(s) be reviewed in the upcoming legislative session as set out in N.C.G.S. 150B-21.3. I further request that the rule(s) be subject to a delayed effective date as set out in that same provision.

Thank you for your consideration.

A handwritten signature in dark ink, appearing to read "Jennifer Beauchamp", with a stylized, cursive script.

Jennifer Beauchamp

Amanda B. Hopkins
212 Natalie Lane
King, NC 27021

March 18, 2021

N.C. Rules Review Commission
6714 Mail Service Center
Raleigh, NC 27699-6700

Re: 12 NCAC 09B .0101 and 12 NCAC 09G .0205

Members of the Commission:

As a result of working with public safety employers for multiple years, it has become evident that proper psychological testing along with a clinical interview by a skilled and licensed professional is imperative in selecting candidates for positions that hold a certain level of authority. It is my professional opinion that all Correctional Officer and Juvenile Justice Officer candidates should be viewed similar to Law Enforcement Officer candidates and be fully evaluated with the same respect and regard prior to their employment.

I request that the above rule(s) be reviewed in the upcoming legislative session as set out in N.C.G.S. 150B-21.3. I further request that the rule(s) be subject to a delayed effective date as set out in that same provision.

Thank you for your consideration.

Amanda B. Hopkins

A handwritten signature in cursive script that reads "Amanda B. Hopkins".

Holly D. Lloyd
7510 Bartonshire Ct.
Oak Ridge, NC 27310

Thursday, March 18, 2021

N.C. Rules Review Commission
6714 Mail Service Center
Raleigh, NC 27699-6700

Re: 12 NCAC 09B .0101 and 12 NCAC 09G .0205

Members of the Commission:

My name is Holly Lloyd and I live in the small town of Oak Ridge, NC. In such a small town, the inhabitants often know much about each other. Neighbors help each other keep up with lawn maintenance and during the holidays my kitchen is flooded with homemade baked goods from our neighbors. The above rule(s) are important to me, because the hiring population and the process described is not coming from or occurring in a small town. The positions that those applying for, are those that deserve our respect and appreciation. We should not set these applicants up for failure, which we would be doing when the hiring and evaluative process does not test the applicants in multiple ways. How can we know for sure that they will be best suited for this position, a high stress and turn over position for sure, if we do not know as much about those applying as possible?

I request that the above rule(s) be reviewed in the upcoming legislative session as set out in N.C.G.S. 150B-21.3. I further request that the rule(s) be subject to a delayed effective date as set out in that same provision.

Thank you for your consideration.

Holly D. Lloyd

A handwritten signature in cursive script that reads "Holly D. Lloyd". The ink is dark and the signature is fluid, with the first and last names being more prominent than the middle initial.

Rebecca L. Kepley
185 Gus Hill Road
Clemmons, NC 27012

03/19/2021

N.C. Rules Review Commission
6714 Mail Service Center
Raleigh, NC 27699-6700

Re: 12 NCAC 09B .0101 and 12 NCAC 09G .0205

Members of the Commission:

I have been working with public safety professionals for over five years and was raised in a household of law enforcement and firefighters. The stigma of mental health and wellness is a blatant issue within the community that is addressed reactively. In today's climate, we do not have room for hiring oversights or doing the bare minimum regarding a pre-hire psychological process.

I request that the above rule(s) be reviewed in the upcoming legislative session as set out in N.C.G.S. 150B-21.3. I further request that the rule(s) be subject to a delayed effective date as set out in that same provision.

Thank you for your consideration.

Rebecca Kepley

