

## MEMORANDUM

<b>DATE</b>	November 3, 2022
<b>TO</b>	Board of Psychology
<b>FROM</b>	Sarah Proteau Central Services Technician
<b>SUBJECT</b>	Agenda Item # 6 – Discussion and Possible Approval of the Board Meeting Minutes: August 19, 2022

**Background:**

Attached are the draft minutes of the August 19, 2022, Board Meeting.

**Action Requested:**

Review and approve the minutes of the August 19, 2022, Board Meeting.

1 **Draft August 19, 2022, Meeting Minutes**

2  
3 **Board Members**

4 Lea Tate, PsyD, President  
5 Seyron Foo, Vice President  
6 Sheryll Casuga, PsyD, CMPC  
7 Marisela Cervantes, EdD, MPA  
8 Mary Harb Sheets, PhD  
9 Julie Nystrom  
10 Stephen Phillips, JD, PsyD  
11 Ana Rescate  
12 Shacunda Rodgers, PhD

13  
14 **Board Staff**

15 Antonette Sorrick, Executive Officer  
16 Jon Burke, Assistant Executive Officer  
17 Stephanie Cheung, Licensing Manager  
18 Jason Glasspiegel, Central Services Manager  
19 Sandra Monterrubio, Enforcement Program Manager  
20 Liezel McCockran, CE/Renewals Coordinator  
21 Suzy Costa Darrow, Legislative and Regulatory Analyst  
22 Sarah Proteau, Central Services Office Technician  
23 Norine Marks, Board Counsel  
24 Heather Hoganson, Regulatory Counsel

25  
26  
27 **Agenda Item 1: Call to Order/Roll Call/Establishment of a Quorum**

28  
29 President Tate welcomed all participants. Prior to roll call, the ceremonial oath was  
30 administered to Dr. Cervantes who was reappointed to the Board and whose  
31 reappointment became effective on June 1, 2022 and would expire on June 1, 2026.

32  
33 Dr. Tate called the meeting to order at 9:03 a.m., roll was taken, and a quorum  
34 established.

35  
36 **Agenda Item 2: President's Welcome**

37  
38 Dr. Tate provided the Board mission and announced the retirement of longtime staff  
39 member, Ms. Diana Brown, and the temporary return of Ms. Norine Marks as Board  
40 counsel.

41  
42 Dr. Tate asked Dr. Rodgers to lead a mindfulness exercise.  
43

- 44 a) Mindfulness Exercise (Rodgers)  
45 b) Meeting Calendar  
46

47 There was no Board or public comment offered.  
48

49 **Agenda Item 3: Public Comment for Items Not on the Agenda.**  
50

51 There was no Board or public comment offered.  
52

53 **Agenda Item 4: Discussion and Possible Approval of the Board Meeting Minutes:**  
54 **April 29, 2022**  
55

56 Dr. Tate introduced this item.  
57

58 It was M/(Harb Sheets)/S(Rodgers)/C to approve to minutes as written.  
59

60 There was no Board or public comment offered.  
61

62 Votes: 9 Ayes (Casuga, Cervantes, Foo, Harb Sheets, Nystrom, Phillips, Rescate,  
63 Rodgers, Tate), 0 Noes  
64

65 **Agenda Item 5: Executive Officer's Report**  
66

- 67 a) Personnel Update  
68 b) COVID-19 Update  
69

70 Ms. Sorrick provided these updates.  
71

72 There was no Board or public comment offered.  
73

74 **Agenda Item 6: DCA Update**  
75

76 Dr. Tate introduced this item and Brian Clifford, DCA, provided this update which  
77 included:

- 78 • SB 189 which was signed by the governor on June 30, 2022, and  
79 reinstated the remote meeting provisions of the Bagley Keen Open  
80 Meeting Act that were in place during the active COVID-19 pandemic  
81 • DCA personnel updates  
82 • A reminder regarding required trainings  
83

84 There was no Board or public comment offered.  
85

86 **Agenda Item 7: Budget Report**  
87

88 Dr. Tate introduced this item and Mr. Glasspiegel provided this update

89

90 Discussion ensued regarding the difference in projected versus actual costs, how the  
91 report was structured, and the state of the fund balance and fund balance reserve which  
92 had increased by a small amount due to cost saving efforts.

93

94 Mr. Foo commented regarding the fund balance and noted the negative projections for  
95 Fiscal Year 2024/2025. He stated that this was part of the reason why the Board had  
96 been exploring and pursuing various opportunities to address the fund balance deficit.  
97 Mr. Foo commented that without the appropriate increase of the fees to reflect the  
98 previous three decades of flat fees the fund would continue to run at a deficit.

99

100 It was stated that there would be a more in-depth and detailed presentation on the Board  
101 budget at the November Board meeting.

102

103 There was no further Board and no public comment offered.

104

105 **Agenda Item 8: Presentation by Health Professions Education Foundation on**  
106 **Licensed Mental Health Services Provider Education Program (LMHSPEP) and**  
107 **Mental Health Loan Assumption Program (MHLAP); Discussion and Questions to**  
108 **Follow.**

109

110 Dr. Tate introduced this item and Ms. Michelle Crouch, Program Officer for the  
111 Department of Healthcare Access and Information (HCAI), presented this item.

112

113 Discussion ensued on outreach and how licensees would know about this program to  
114 be able to apply. It was determined that the Board could make a reference in the  
115 journal/newsletter.

116

117 There was no further Board or public comment offered.

118

119 **Agenda Item 9: Licensing Committee Report and Consideration of Committee**  
120 **Recommendations**

121

122 a) Licensing Report

123

124 Ms. Cheung provided this report.

125

126 Discussion ensued regarding how to interpret the data provided on the report  
127 attachments. Ms. Cheung provided clarification.

128

129 Public Comment

130

131 Melody Shaefer asked about average timeframes of renewal which were provided by Mr.  
132 Glasspiegel.

133  
134 There was no further comment offered.

135  
136 Dr. Harb Sheets, Committee Chair, stated that Agenda Item 12 would be taken next and  
137 the remaining items in the Licensing Committee Report would be discussed subsequent  
138 to Agenda Item 12.

139  
140 **Agenda Item 12: Association of State and Provincial Psychology Boards (ASPPB)**  
141 **EPPP2 Update – May 16-17, 2022 - Townhall Meeting Report**

142  
143 Dr. Casuga provided this update and stated that Dr. Matt Turner, ASPPB, would be in  
144 attendance to answer questions.

145  
146 Dr. Turner stated there had been two town hall meetings for Licensing Boards and one  
147 town hall meeting for stakeholders and that there would be a recording available through  
148 ASPPB.

149  
150 Dr. Harb Sheets asked Dr. Turner about a timeframe of when ASPPB would make a  
151 decision as to whether or not to require the EPPP-2.

152  
153 Dr. Turner stated it was his understanding the next Board of Directors meeting for ASPPB  
154 would be in October and it was possible that they could make a decision at that time.

155  
156 Discussion ensued regarding the necessity of measuring competency in practice for  
157 psychologists.

158  
159 There was no further Board comment and no public comment offered.

160  
161 Dr. Harb Sheets stated they would continue with item 9(b) and would take public comment  
162 for all of item 9 at the end.

163  
164 b) Multiple Test Takers Statistical Report (L. Snyder)

165  
166 Ms. Snyder provided this report.

167  
168 There was no Board comment offered.

169  
170 c) Continuing Education and Renewals Report (L. McCockran)

171  
172 Ms. McCockran provided this update.

173  
174 There was no Board comment offered.

175  
176 d) Board Response to Psychologist Applications – Correspondence Review (S.  
177 Cheung)

178 Dr. Harb Sheets introduced, and Ms. Cheung presented this item.

179 Discussion ensued about the process of licensure and the type of communication  
180 templates that are used, and access to the processing timeframes that applicants have,  
181 which are listed on the Board website and updated regularly.

182 Dr. Casuga asked for more information as to the types of testing accommodations  
183 available to applicants.

184 Ms. Snyder provided a summary of the types of accommodations that can be applied for  
185 in taking the licensing exams, which are listed on the Board website.

186 Ms. Marks commented that item 9(d) would typically be up before the Licensure  
187 Committee for review and discussion and since the Licensure Committee would not  
188 meet until 2023, she suggested that a motion be made for Board delegation to the  
189 Licensure Committee members to meet with staff and counsel and go over the item,  
190 correspondence templates, including comments received, and to revise this agenda  
191 item to bring back to the Board Meeting in November.

192 It was M/(Tate)/S(Cervantes)/C to delegate to Licensure Committee and staff to meet  
193 and go over the comments and bring back a revised version that incorporates the  
194 comments to the November Board meeting.

195  
196 There was no Board or public comment offered.

197  
198 Vote: 9 Ayes (Casuga, Cervantes, Foo, Harb Sheets, Nystrom, Phillips, Rescate,  
199 Rodgers, Tate), 0 Noes

200  
201 e) Legislation: Acceptable Verification of Pre-Licensure Coursework  
202 Requirements, Business and Professions Code sections 2915.4 and 2915.5  
203 (S. Cheung)

204  
205 Ms. Cheung provided this update.

206  
207 Dr. Rodgers provided comment of support for additional options to show proof of pre-  
208 licensure coursework.

209  
210 It was M/(Foo)/S(Cervantes)/C to support the Licensure Committee request to approve  
211 the proposed amendments and delegate authority to the Executive Officer to seek an  
212 author for legislation regarding to these requirements.

213  
214 There was no public comment offered.

215  
216 Vote: 9 Ayes (Casuga, Cervantes, Foo, Harb Sheets, Nystrom, Phillips, Rescate,  
217 Rodgers, Tate), 0 Noes

218  
219 Approved Text

220  
221 **2915.4.**

222 (a) Effective January 1, 2020, an applicant for licensure as a psychologist shall show, as  
223 part of the application, that he or she has completed a minimum of six hours of  
224 coursework or applied experience under supervision in suicide risk assessment and  
225 intervention. This requirement shall be met in one of the following ways:

226  
227 (1) Obtained as part of ~~his or her~~ the applicant's qualifying graduate degree  
228 program. To satisfy this requirement, the applicant shall submit to the board a  
229 transcript indicating completion of this coursework. In absence of this coursework  
230 title in the transcript, the applicant shall submit a written certification from the  
231 registrar, department chair, or training director of the educational institution or  
232 program from which the applicant graduated stating that the coursework required  
233 by this section is included within the institution's curriculum required for  
234 graduation at the time the applicant graduated, or within the coursework that was  
235 completed by the applicant.

236  
237 (2) Obtained as part of ~~his or her~~ the applicant's applied experience. Applied  
238 experience can be met in any of the following settings: practicum, internship, or  
239 formal postdoctoral placement that meets the requirement of Section 2911, or  
240 other qualifying supervised professional experience. To satisfy this requirement,  
241 the applicant shall submit to the board a written certification from the director of  
242 training for the program or primary supervisor where the qualifying experience  
243 has occurred stating that the training required by this section is included within  
244 the applied experience.

245  
246 (3) By taking a continuing education course that meets the requirements of  
247 subdivision (e) or (f) of Section 2915 and that qualifies as a continuing education  
248 learning activity category specified in paragraph (2) or (3) of subdivision (c) of  
249 Section 2915. To satisfy this requirement, the applicant shall submit to the board  
250 a certification of completion.

251  
252 (b) Effective January 1, 2020, as a one-time requirement, a licensee prior to the time of  
253 his or her first renewal after the operative date of this section, or an applicant for  
254 reactivation or reinstatement to an active license status, shall have completed a  
255 minimum of six hours of coursework or applied experience under supervision in suicide  
256 risk assessment and intervention, as specified in subdivision (a). Proof of compliance

257 with this section shall be certified under penalty of perjury that he or she is in  
258 compliance with this section and shall be retained for submission to the board upon  
259 request.

260

261 *(Added by Stats. 2017, Ch. 182, Sec. 1. (AB 89) Effective January 1, 2018.)*

262

263 **2915.5.**

264 (a) Any applicant for licensure as a psychologist as a condition of licensure, a minimum  
265 of six contact hours of coursework or applied experience in aging and long-term care,  
266 which may include, but need not be limited to, the biological, social, and psychological  
267 aspects of aging. This coursework shall include instruction on the assessment and  
268 reporting of, as well as treatment related to, elder and dependent adult abuse and  
269 neglect.

270

271 (b) In order to satisfy the coursework requirement of this section, the applicant shall  
272 submit to the board a transcript indicating completion of this coursework. In absence of  
273 this coursework title in the transcript, the applicant shall submit a written certification  
274 from the registrar, department chair, or training director of the educational institution or  
275 program from which the applicant graduated stating that the coursework required by this  
276 section is included within the institution's required curriculum for graduation at the time  
277 the applicant graduated, or within the coursework, that was completed by the applicant.

278

279 (c) (1) If an applicant does not have coursework pursuant to this section, the applicant  
280 may obtain evidence of compliance as part of their applied experience in a practicum,  
281 internship, or formal postdoctoral placement that meets the requirement of Section  
282 2911, or other qualifying supervised professional experience.

283

284 (2) To satisfy the applied experience requirement of this section, the applicant shall  
285 submit to the board a written certification from the director of training for the program  
286 or primary supervisor where the qualifying experience occurred stating that the  
287 training required by this section is included within the applied experience.

288

289 (d) If an applicant does not meet the curriculum or coursework requirement pursuant to  
290 this section, the applicant may obtain evidence of compliance by taking a continuing  
291 education course that meets the requirements of subdivision (d) or (e) of Section 2915  
292 and that qualifies as a learning activity category specified in paragraph (2) or (3) of  
293 subdivision (c) of Section 2915. To satisfy this requirement, the applicant shall submit to  
294 the board a certification of completion.

295

296 (e) A written certification made or submitted pursuant to this section shall be done under  
297 penalty of perjury.

298

299 *(Amended by Stats. 2021, Ch. 647, Sec. 10. (SB 801) Effective January 1, 2022.)*

300



301 Dr. Harb Sheets opened public comment for Agenda Items 9(a) – 9(b).

302

303 There was no public comment offered.

304

305 **Agenda Item 10: Licensing Timeframes Update – Short-term and Long-Term**  
306 **Solutions to the Application Backlogs** (S. Cheung)

307

308 Ms. Cheung provided this update. Topics included: Historical staffing statistics and  
309 processing times, the volume of new applications received, and the efforts made to obtain  
310 more positions through a Budget Change Proposal.

311

312 Public Comment

313

314 Dr. Jo Linder Crow, CPA, thanked the Board and staff for adding this item to the agenda  
315 and their attention to the issue of wait times.

316

317 Dr. Elizabeth Winkelman, CPA, echoed the comments of Dr. Linder Crow and discussed  
318 the attached CPA survey results that were included in the materials.

319

320 Dr. Eric Samuels, Psy.D. and President of Alameda Psychological Association provided  
321 comments about average wait times.

322

323 Dr. Melody Schaefer and Dr. Michelle Willingham echoed previous comments made.

324

325 Dr. Harb Sheets stated her appreciation for the comments provided and her  
326 understanding of the frustration licensees and applicants had expressed throughout the  
327 budget and staffing challenges the Board has faced.

328

329 Mr. Foo echoed appreciation for the feedback provided and complimented the Licensing  
330 Unit staff for their professionalism in how the concerns expressed had been responded  
331 to.

332

333 Discussion ensued regarding goals for application turnaround time and the general  
334 timeline for application processes and communication as well as contextual information  
335 as to how vacant positions would be filled.

336

337 Dr. Tate expressed appreciation for the robust discussion, comments provided from  
338 participants and the efforts made to find short and long-term solutions for this difficult  
339 problem.

340

341 There was no further Board or public comment offered.

342

343 **Agenda Item 11: Enforcement Report**

344

345 Dr. Tate introduced this item and Ms. Monterrubio provided this update.

346

347 Discussion ensued regarding performance measures, case volume and targets for the  
348 Enforcement Unit.

349

350 There was no further Board and no public comment offered.

351

352 **Agenda Item 13: Legislative and Regulatory Affairs Committee Report and**  
353 **Consideration of Committee Recommendations**

354

355 Dr. Cervantes, Committee Chair, introduced this item and Ms. Costa Darrow provided  
356 updates on each item.

357

358 a) Legislation from the 2021 Legislative Session: Review and Possible Action (M.  
359 Cervantes)

360

361 1) Board Sponsored Legislation

362

363 SB 401 (Pan) Healing arts: psychology - Amendments to sections  
364 2960 and 2960.1 of the Business and Professions Code Regarding  
365 Denial, Suspension and Revocation for Acts of Sexual Contact

365

366 Ms. Costa Darrow provided this update which was provided as information only with no  
367 action required.

368

369 There was no Board or public comment offered,

370

371

372 2) Bills with Active Positions Taken by the Board

373

374 A) AB 32 (Aguiar-Curry) Telehealth

375

376 Ms. Costa Darrow provided this update, which was provided as information only, with no  
377 action required.

378

379 There was no Board or public comment offered.

380

381

382 B) SB 731 (Durazo) Criminal records: relief

383

384 Ms. Costa Darrow provided this update and stated the Board had previously taken an  
385 oppose position on the bill due to concerns with specific felonies in the language. She  
386 stated that while our initial concern had been removed, there were still concerns from  
387 Board staff about this bill, so Board staff still recommends an Oppose position.

386

387 Discussion ensued regarding this update, and it was determined that a motion would be  
388 made even though it was for information only.

389  
390 It was M/(Tate)S/(Phillips)/C to approve the staff recommendation to Oppose SB 731  
391 (Durazo) and to forward the Board's current concerns to the author.

392  
393 Ms. Nystrom recused herself from voting due to their position with the State Senate.

394  
395 There was no Board or public comment offered.

396  
397 Votes: 8 Ayes (Casuga, Cervantes, Foo, Harb Sheets, Phillips, Rescate, Rodgers, Tate),  
398 0 Noes, 1 Recusal (Nystrom)

399  
400  
401 3) Watch Bill

402  
403 A) AB 646 (Low) Department of Consumer Affairs: boards: expunged  
404 convictions

405  
406 Ms. Costa Darrow provided this update and stated that AB 646 (Low) failed to pass out  
407 of the Senate Appropriations Committee and was held in suspense.

408  
409 There was no further Board and no public comment offered.

410  
411 b) Legislation from the 2022 Legislative Session: Review and Possible Action (M.  
412 Cervantes)

413  
414 1) Review of Bills for Active Position Recommendations to the Board  
415 AB 2222 (Reyes) Student financial aid: Golden State Social  
416 Opportunities Program

417  
418 Ms. Costa Darrow provided this update and stated that the Legislative and Regulatory  
419 Affairs Committee saw a version of this bill on June 10, 2022. At that time, Board staff  
420 had concerns about the bill and recommended a Support if Amended position because  
421 the bill would have required the Board to track the work settings of grant recipients to  
422 certify whether these registered psychological associates were working in California-  
423 based nonprofits. The version of the bill, as amended on 8/17/2022, has these concerns  
424 removed. Additionally, the latest version has removed language requiring an annual  
425 budget appropriation because the Governor has committed funding to add 40,000 new  
426 mental health workers to California's workforce.

427  
428 Board staff recommends a Support if Amended position on AB 2222 (Reyes).

429  
430 M/(Tate)S/(Casuga)/C to adopt a Support if Amended position for AB 2222 (Reyes).

431  
432 Ms. Nystrom recused herself from voting due to their position with the state senate.

433  
434  
435  
436  
437  
438  
439  
440  
441  
442  
443  
444  
445  
446  
447  
448  
449  
450  
451  
452  
453  
454  
455  
456  
457  
458  
459  
460  
461  
462  
463  
464  
465  
466  
467  
468  
469  
470  
471  
472  
473  
474  
475  
476

There was no further Board and no public comment offered.

Votes: 8 Ayes (Casuga, Cervantes, Foo, Harb Sheets, Phillips, Rescate, Rodgers, Tate),  
0 Noes, 1 Recusal (Nystrom)

2) Bills with Active Positions Taken by the Board

A) AB 1662 (Gipson) Licensing boards: disqualification from  
licensure: criminal conviction

Dr. Cervantes introduced this item and stated that comment would be taken after Ms.  
Costa Darrow provided summaries for the three bills.

Ms. Costa Darrow provided a summary of this item and stated the bill died and is not  
moving on.

B) AB 2754 (Bauer-Kahan) Psychology: supervising  
psychologists: qualifications

Ms. Costa Darrow provided a summary of this item and stated that the bill was presented  
to the Governor on August 16, 2022.

C) SB 1428 (Archuleta) Psychologists: psychological testing  
technician: registration

Ms. Costa Darrow provided a summary of this item, stated the Board's previous position  
of Support if Amended, and that the bill had been amended on the senate floor. She  
stated that Board staff did not have that additional language included in the Board-  
approved amendments, and staff did not have any concerns about this amendment  
since it was consistent with our practice act. Therefore, Board staff has modified the  
position to a Support position on SB 1428 (Archuleta).

This bill is on the Assembly Floor and Board staff is in the process of getting a letter  
approved to submit to both to the Assembly Floor and the Governor's Office.

There was no Board comment offered.

Public Comment

Dr. Jo Linder Crow, CPA, thanked staff for Board support on two CPA sponsored bills AB  
2754 (Bauer-Kahan) and SB 1428 (Archuleta)

No further public comment was offered.

- 477 3) Watch Bills  
478 A) AB 58 (Salas) Pupil health: suicide prevention policies and  
479 training.  
480 B) AB 1860 (Ward) Substance abuse treatment: certification.  
481 C) AB 2229 (Luz Rivas) Peace officers: minimum standards: bias  
482 evaluation.  
483 D) AB 2274 (Blanca Rubio) Mandated reporters: statute of  
484 limitations.  
485 E) SB 189 (Committee on Budget and Fiscal Review) State  
486 Government.  
487 F) SB 1223 (Becker) Criminal procedure: mental health diversion.  
488

489 Dr. Cervantes introduced these items, stated that the status of the bills could be found in  
490 the combined packet of the meeting materials between page 281 and 320.  
491

492 This was provided as information only, with no action required.  
493

494 There was no Board or public comment offered.  
495

- 496 4) Legislative Items for Future Meeting. The Board May Discuss  
497 Other Items of Legislation in Sufficient Detail to Determine Whether  
498 Such Items Should be on a Future Board Meeting Agenda and/or  
499 Whether to Hold a Special Meeting of the Board to Discuss Such  
500 Items Pursuant to Government Code section 11125.4.  
501

502 Dr. Cervantes introduced this item.  
503

504 There was no Board or public comment offered.  
505  
506

- 507 5) Regulatory Update, Review, and Consideration of Additional  
508 Changes (M. Cervantes)  
509

510 Dr. Cervantes introduced this item which was included in the meeting materials  
511 beginning on page 321 of the combined packet meeting materials.  
512

513 This was provided as informational only with no action required.  
514

- 515 a) 16 CCR sections 1381.9, 1397.60, 1397.61, 1397.62, 1397.67 –  
516 Continuing Professional Development  
517

518 Mr. Glasspiegel provided this update and stated that it was approved by OAL on June  
519 29, 2022  
520

521 b) 16 CCR sections 1391.1, 1391.2, 1391.5, 1391.6, 1391.8,  
522 1391.10, 1391.11, 1391.12, 1392.1 – Registered Psychological  
523 Associates  
524

525 Mr. Glasspiegel provided this update.  
526

527 c) 16 CCR sections 1391.13, and 1391.14 – Inactive Psychological  
528 Associates Registration and Reactivating a Psychological  
529 Associate Registration  
530

531 Mr. Glasspiegel provided this update.  
532

533 d) 16 CCR sections 1392 and 1392.1 – Psychologist Fees and  
534 Psychological Associate Fees  
535

536 Mr. Glasspiegel provided this update.  
537

538 e) 16 CCR 1395.2 – Disciplinary Guidelines and Uniform  
539 Standards Related to Substance-Abusing Licensees  
540

541 Mr. Glasspiegel provided this update.  
542

543 f) 16 CCR sections 1380.3, 1381, 1381.1, 1381.2, 1381.4, 1381.5,  
544 1382, 1382.3, 1382.4, 1382.5, 1386, 1387, 1387.1, 1387.2,  
545 1387.3, 1387.4, 1387.5, 1387.6, 1387.10, 1388, 1388.6, 1389,  
546 1389.1, 1391, 1391.1, 1391.3, 1391.4, 1391.5, 1391.6, 1391.8,  
547 1391.11, and 1391.12 – Pathways to Licensure  
548

549 Mr. Glasspiegel provided this update.  
550

551 g) 16 CCR sections 1380.6, 1393, 1396, 1396.1, 1396.2, 1396.3,  
552 1396.4, 1396.5, 1397, 1397.1, 1397.2, 1397.35, 1397.37,  
553 1397.39, 1397.50, 1397.51, 1397.52, 1397.53, 1397.54,  
554 1397.55 - Enforcement Provisions  
555

556 Mr. Glasspiegel provided this update.  
557

558 There was no Board or public comment offered for Agenda Item 13.  
559

560 **Agenda Item 14: Consideration of any Written Comments and Responses and**  
561 **Possible Adoption of 16 CCR Sections 1381.10, 1392, and 1397.69 – Retired**  
562 **License, Renewal of Expired License, Psychologist Fees (Retired License)**  
563

564 Mr. Glasspiegel provided a summary of this item and stated that the Board is  
565 implementing BPC Section 2988.5, which became effective on January 1, 2017, with  
566 Senate Bill (SB) 1193 (Hill, Chapter 484, Statutes of 2016). This newly added section  
567 gives the Board the authority to issue a retired license to a psychologist who holds a  
568 current license issued by the Board. This bill was the product of the sunset review  
569 process, by which the Senate and Assembly Business and Professions Committees  
570 recommended that the Board provide recommendations to the Legislature to establish a  
571 retired license. At the time the legislative proposal was submitted, retired licenses were  
572 the most common constituent inquiry legislative staff received from the Board's  
573 licensees. Although SB 1193 gave the Board the statutory authority to issue retired  
574 licenses, it does not specify the requirements and procedures for obtaining this license  
575 status. The purpose of the proposed regulatory language is to specify the requirements  
576 for obtaining and maintaining a psychologist license in retired status. This rulemaking  
577 file brings the Board in compliance with the changes enacted by SB 1193.

578  
579 This package was noticed for the initial 45-day comment period on October 15, 2021.  
580 The comment period for this rulemaking file ended on November 30, 2021. The  
581 regulatory hearing took place on December 1, 2021. Due to the absence of any  
582 negative comments, the Board voted to approve the language as noticed at the  
583 February 2022 Board meeting. This package was submitted to the Office of  
584 Administrative Law (OAL) for their final review on May 9, 2022. During their initial  
585 review, OAL suggested some changes, which were incorporated into the modified text  
586 and noticed on July 5, 2022. The comment period for this modified text ran from July 5  
587 through July 21, 2022.

588  
589 Comments were received for the Board's consideration and were included in the  
590 meeting materials. Mr. Glasspiegel noted that comments 1, 2, and 3 were received  
591 within the comment period but were generally outside the scope of the modified text. He  
592 also noted that comment 4 was received before the comment period for the modified  
593 text. Mr. Glasspiegel also noted that social security numbers are never released by  
594 Board staff, as suggested in comment 1.

595  
596 It was M/(Harb Sheets)S/(Tate)/C to not make any changes to the text in response to  
597 the  
598 comments received, and to adopt Sections 1381.10, 1392, and 1397.69 as well as  
599 delegating to the Executive Officer the authority to make any technical and non-  
600 substantive changes required by control agencies as this regulatory package is being  
601 finalized.

602  
603 Votes: 8 Ayes (Casuga, Cervantes, Harb Sheets, Nystrom, Rescate, Rodgers, Tate), 0  
604 Noes, 2 Absences (Foo, Phillips).

605  
606 There was no Board and no public comment offered  
607

610 § 1381.10. Retired Status.

612 (a) Pursuant to Section 2988.5 of the Code, a psychologist who holds a current  
613 active or current inactive license, issued by the Board, may apply to place that  
614 license in retired status by submitting Form PSY 900 (New 2021), which is  
615 hereby incorporated by reference.

617 (b) As used in Section 2988.5 of the Code:

618 (1) “Otherwise restricted by the board” means that the license is not  
619 currently ~~en~~includes probation ~~or~~, subject to any other terms and  
620 conditions, or the licensee is ~~not~~ restricted from practice.

622 (2) “Subject to discipline under this chapter” means ~~that there are no~~  
623 pending ~~court or administrative actions to restrict the applicant’s~~  
624 ~~practice for violations of Chapter 6.6 of Division 2 (commencing with~~  
625 ~~section 2900). Accusations pursuant to the Administrative Procedure~~  
626 ~~Act, Interim Suspension Orders filed pursuant to section 494 of the~~  
627 ~~Code, evaluations pursuant to Section 820 of the Code, or practice~~  
628 ~~restrictions pursuant to Penal Code section 23.~~

629 (c) To apply to restore the license to active status if the application to place  
630 the license in retired status was granted less than three (3) years prior, in  
631 addition to any other requirements in 2988.5 of the Code, the licensee shall:  
632

633 (1) Submit Form PSY 905 (New 2021), which is hereby incorporated by  
634 reference, and pay the biennial renewal fee as prescribed in section  
635 1392(d) of the Board’s regulations and all additional fees as prescribed  
636 in section 2987.2 of the Code, and section 1397.69 of the Board’s  
637 regulations at the time the request to restore to active status is received;  
638

639 (2) Furnish to the Department of Justice, a full set of electronic  
640 fingerprints for the purpose of conducting a criminal history record check  
641 and to undergo a state and federal level criminal offender record  
642 information search if the licensee has not been previously fingerprinted for  
643 the Board or for whom an electronic record of the submission of  
644 fingerprints does not exist in the Department of Justice’s criminal offender  
645 identification database.

647 (d) To apply to restore the license to active status (3) or more years from the  
648 date of issuance of the license in retired status, the licensee shall comply with  
649 the requirements in 2988.5(d)(2) of the Code.



651 (e) The Board will not grant an application for a license to be placed in a  
652 retired status more than twice.  
653

654 (f) A licensee who has been granted a license in retired status twice must  
655 apply for a new license in order to obtain a license in active status.  
656

657 Note: Authority cited: Sections 2930 and 2988.5 Business and  
658 Professions Code. Reference: Sections 118, 2960, 2960.6, and 2988.5,  
659 Business and Professions Code; and Section 11105(b)(10), Penal Code.  
660

661 **§ 1392. Psychologist Fees.**  
662

663 (a) \* \* \*

664 (b) \* \* \*

665 (c) \* \* \*

666 (d) \* \* \*

667 (e) \* \* \*

668 (f) The application fee for a retired license is \$75.00.  
669

670 Note: Authority cited: Sections 2930, 2987, 2988.5, and 2989, Business  
671 and Professions Code.

672 Reference: Sections 2987, 2988, 2988.5, and 2989, Business and Professions  
673 Code.  
674

675 **§ 1397.69. Continuing Professional Development Audit Fee ~~Licensee Fees.~~**  
676

677 For the administration of this article, in addition to any other fees due the  
678 Board, and as a condition of renewal or reinstatement, a \$10 fee is to  
679 be paid to the Board by a licensee renewing in an active status or after  
680 inactive, ~~or delinquent~~ expired, or reactivating from a retired status.  
681

682 Note: Authority cited: Sections ~~2915(g)~~ and 2930, Business and  
683 Professions Code. Reference: Sections 2915(jh) and 2988.5,  
684 Business and Professions Code.  
685  
686

687 **Agenda Item 15: Recommendations for Agenda Items for Future Board Meetings.**  
688 **Note: The Board May Not Discuss or Take Action on Any Matter Raised During This**  
689 **Public Comment Section, Except to Decide Whether to Place the Matter on the**  
690 **Agenda of a Future Meeting [Government Code Sections 11125 and 11125.7(a)].**  
691

692 Board comment  
693

694 Dr. Casuga asked that the Board continue with a mindfulness exercise in the next meeting  
695 and an update from ASPPB if there is any new information.

696  
697 Public comment

698  
699 Dr. Elizabeth Winkelman, CPA, requested updates on response times for the Licensing  
700 Unit.

701  
702 **CLOSED SESSION**

703  
704 **Agenda Item 16 The Board Will Meet in Closed Session to Discuss and Deliberate**  
705 **on Disciplinary Matters, Pursuant to Government Code section 11126(c)(3).**

706  
707 **The meeting adjourned at 4:17 p.m.**

DRAFT

## MEMORANDUM

<b>DATE</b>	October 21, 2022
<b>TO</b>	Board Members
<b>FROM</b>	Stephanie Cheung Licensing Manager
<b>SUBJECT</b>	<b>Agenda Item 21</b> Licensing Timeframes Update – Short-Term and Long-Term Solutions to the Application Backlogs

### **Background:**

At the August 2022 Board Meeting, the Board was provided a snapshot of the current timeframes and the short-term and long-term plan to address the lengthened times observed in the beginning of the year. This is to provide an update about the status of the short-term temporary and long-term permanent solutions.

### **a) Short-Term Temporary Solutions**

The Board acquires temporary help to assist with the review and processing of licensing and registration applications. Status of additional temporary personnel as follows: -

<b>Temporary Personnel Positions</b>	<b>Status</b>
1. Retired Annuitant	Onboarded since April 2022
2. Additional Retired Annuitant	Onboarded in mid-October 2022
3. Special Projects Coordinator	Onboarded since May 2022

### **b) Long-Term Permanent Solutions**

The Board's long-term plan includes legislative and regulatory efforts, seeking additional resources through budget change proposal and redirecting personnel within the Board, and the ongoing evaluation and improvement of our business processes to drive enhancement changes of the BreEZe system.

<b>Various Long-Term Solutions</b>	<b>Status</b>
1a. Pathways to Licensure – Statutory changes	Complete
1b. Pathways to Licensure – Regulatory changes	Next up for drafting
2. Budget Change Proposal	Prepare for submission in Spring 2023
3. Redirecting Office Technician (OT) Position to the Licensing Unit	Onboarded in late October 2022
4. Review and prepare for PaperLite transition	Scheduled for Q1 2023
5. BreEZe changes	Ongoing

By putting in place the long-term and short-term solutions, the Board aims for positive impacts through shortening the processing timeframes compared to the beginning of the year. This reference information is updated approximately every two weeks. We are hopeful to maintain these improved timeframes as we continue to implement the above solutions.

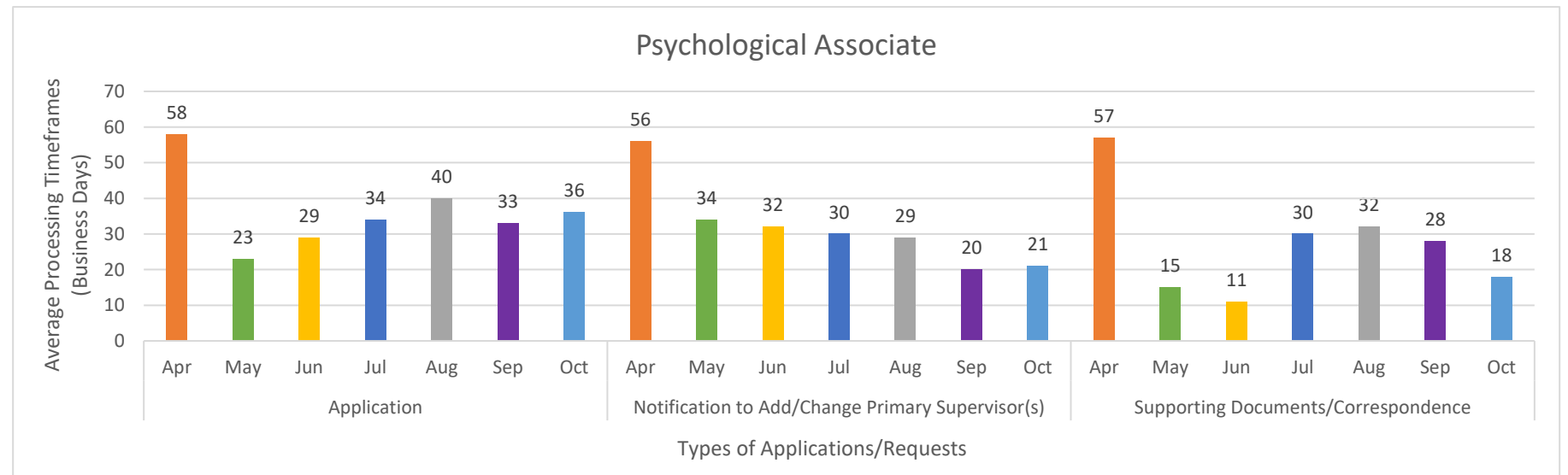
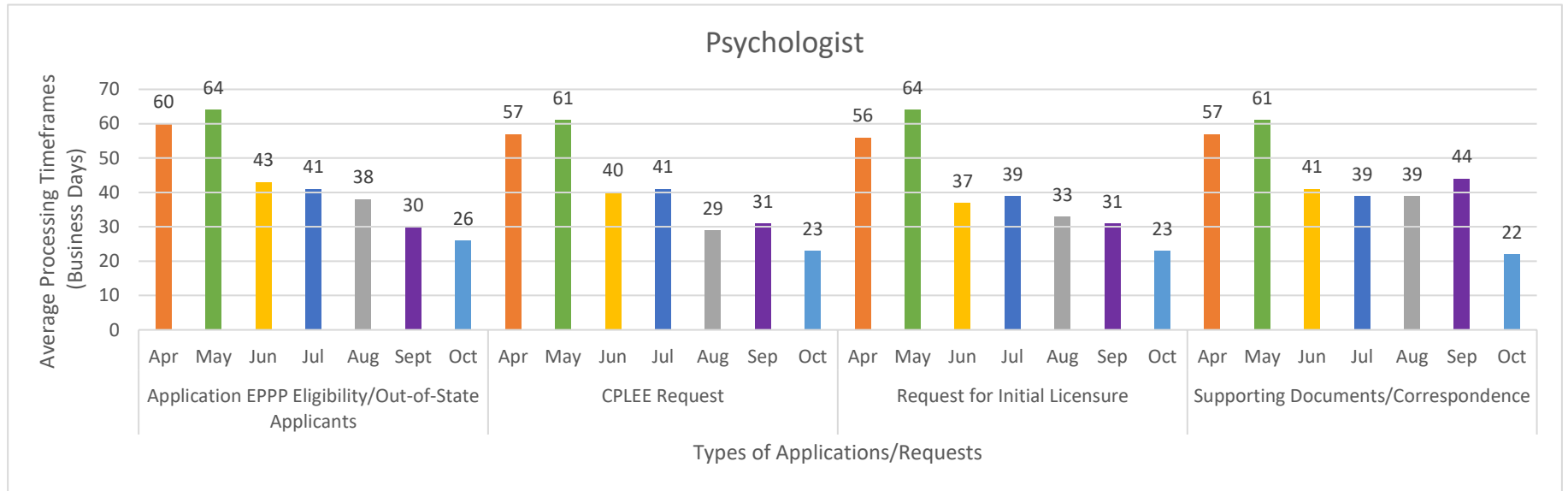
**Attachment:**

Application Processing Timeframes

**Action Requested:**

For informational purposes only. No action is required.

Average Application Processing Timeframes from April 2022 to October 2022  
As of November 1, 2022



The Board is currently processing applications received on the following dates as of October 27, 2022.

Type of Application / Request	Date Received*
<b>Psychologist</b>	
Application: EPPP Eligibility / Out-of-State Applicants	September 9, 2022
CPLÉE Request	September 13, 2022
Request for Initial Licensure	September 14, 2022
Supporting Documents / Correspondence	September 7, 2022
<b>Psychological Associate</b>	
Application	September 15, 2022
Notification to Add / Change Primary Supervisor(s)	September 12, 2022
Supporting Documents / Correspondence	September 27, 2022

*\*All applicants are notified when the Board receives their application. CPLÉE Request, Request for Initial Licensure, Notification, and any subsequent documents/information received will be added to the processing queue automatically – Applicants will be notified regarding the status of their application when the review is complete.*

---

## MEMORANDUM

<b>DATE</b>	November 18, 2022
<b>TO</b>	Board Members
<b>FROM</b>	Lavinia Snyder Examination Coordinator
<b>SUBJECT</b>	Agenda Item 22: Association of State and Provincial Psychology Boards (ASPPB) EPPP2 Update – October 26, 2022 – Board of Directors (S. Casuga)

ASPPB recently announced that the EPPP will only be offered as a two-part examination effective January 1, 2026. Below is a copy of the announcement and factual overview provided by ASPPB.

**Attachments:**

1. EPPP Announcement October 2022
2. EPPP Factual Overview



# ASPPB

Association of State and  
Provincial Psychology Boards

Supporting member jurisdictions in fulfilling their responsibility of public protection

**President**

Alan B. Slusky, PhD, CPsych

**Chief Executive Officer**

Mariann Burnett-Atwell, PsyD

**Past President**

Tomás R. Granados, PsyD

**President-Elect**

Herbert L. Stewart, PhD

**Secretary-Treasurer**

Cindy Olvey, PsyD

**Members at Large**

Michelle G. Paul, PhD

Hugh D. Moore, PhD, MBA

Jennifer C. Laforce, PhD, CPsych

**Associate Executive Officer**

**Member Services**

Janet P. Orwig, MBA, CAE

**Senior Director of Examinations**

**Services**

Matt Turner, PhD

**Director of Educational Affairs**

Jacqueline B. Horn, PhD

**Director of Professional Affairs**

Alex Siegel, JD, PhD

**Business Director**

Lisa M. Fagan, MBA

October 28, 2022

Dear ASPPB Member Boards:

The ASPPB Board of Directors (“Board”) would like to update member jurisdictions on the status of the EPPP. As you know, the EPPP was updated to include two parts (knowledge and skills) as a comprehensive examination that allows jurisdictions to more completely measure competency of candidates for licensure. In 2018, the Board made the decision to allow jurisdictions to use the EPPP (Part 2- Skills) optionally with the promise to membership to revisit the future of the EPPP in 2022.

Over the past several years the Board has spent considerable time gathering feedback from its jurisdictional members, liaisons to ASPPB, and various other stakeholders in the psychology community. Some of these activities have included discussions about the EPPP at ASPPB membership meetings, jurisdictional question and answer sessions, engagement with the training and education community, and the creation of the collaborative Examination Stakeholder Technical Advisory Group (ESTAG). Most recently, ASPPB conducted four Town Hall meetings during the summer of 2022. During the meetings, ASPPB provided those in attendance with a summary of the rationale for the development for the EPPP (Part 2- Skills), and questions surrounding the exam that have been raised by ASPPB membership and other stakeholders. Time was taken to share how those questions have been and continue to be addressed, and an overview was provided on the examination development process. Lastly, comment periods were made available for those who attended the Town Halls to share their thoughts and concerns regarding anything they heard in the presentation. In an effort to extend access to this important information, a recording of the presentation is available at <https://vimeo.com/743463541/0991a45ead>. Attached is a factual overview of the EPPP processes related to the main concerns that have been reported to ASPPB.

ASPPB is guided by its mission to assist its members with their primary responsibility of protecting the health, safety, and welfare of the public. In this effort, the Board remains committed to the ongoing development, refinement, and use of a valid, reliable, state-of-the-art competency assessment for those individuals that are seeking licensure to practice psychology. Consistent with the above, during its October 2022 meeting, the Board unanimously passed the following motion:

***Effective no later than January 1, 2026, the EPPP is one examination with two parts, EPPP (Part 1 – Knowledge) and EPPP (Part 2 – Skills).***

This means the EPPP will only be offered as a two-part examination effective January 1, 2026. We are aware that a number of jurisdictions are ready to move to the two-part model



immediately. Indeed, some already have. The transition in the registration portal can be accomplished fairly quickly. If your jurisdiction is ready to move forward, please notify Dr. Matt Turner at [mturner@asppb.org](mailto:mturner@asppb.org).

Thank you for your continued efforts to ensure safe and competent practice in all of our jurisdictions.

#### The ASPPB Board of Directors

Alan B. Slusky, PhD, CPsych, President  
Tomás R. Granados, PsyD, Past President  
Herbert L. Stewart, PhD, President-Elect  
Cindy Olvey, PsyD, Secretary-Treasurer  
Michelle G. Paul, PhD, Member-at- Large  
Hugh D. Moore, PhD, MBA, Member-at-Large  
Jennifer C. Laforce, PhD, CPsych, Member- at-Large



# ASPPB

Association of State and  
Provincial Psychology Boards

## **An Update on the EPPP from ASPPB: A Factual Overview**

The following information is provided to address misinformation and misunderstandings currently being circulated by communities outside of the regulatory community. First, ASPPB is committed to the development, refinement, and maintenance of a valid, fair, and equitable examination of competence to practice. ASPPB has taken the last five years, since the initial introduction of a two-part national examination in 2017, to listen, learn and move forward thoughtfully. Moreover, we anticipate positive collaboration in the years to come, with various members of the psychology community in these efforts. This document addresses the issues raised in a recent mass email campaign initiated by some in the education and training community. Please take a moment to review the information below and contact ASPPB with any questions, suggestions, or concerns you may have.

**ASPPB is committed to addressing concerns raised by stakeholder groups regarding the examination of an individual's competence to practice psychology. ASPPB has taken many specific action steps to respond and will continue to do so on behalf of its members and the public they serve.**

In 2020, ASPPB established the Examination Stakeholder Technical Advisory Group (ESTAG). ESTAG was charged with (a) providing information on issues/questions raised by the training community and collaborating on methods to address such issues/questions, (b) serving as an additional voice and resource to inform more substantive policy questions from or before EPPP committees, (c) serving as informal liaisons to and from their respective communities regarding the ASPPB Examination Program, and (d) serving as a "think tank" that provides potential research ideas for examination-related matters.

ASPPB intentionally established ESTAG membership to include sharp critics of the EPPP, representatives from the education and training community, representatives from the regulatory community, and experts in test and measures development. There are 11 advisory members on ESTAG with the majority representing the school, counseling, and clinical education and training communities.

ESTAG met numerous times over the course of the last 2 years and conducted extensive work during and in between meetings. Over the summer months of 2022, the members worked to prepare and finalize a report with recommendations to the ASPPB Board of Directors (Board) regarding research options and communication strategies for the EPPP (Part 1- Knowledge) and (Part 2-Skills). Concurrently, ASPPB held four town hall meetings explicitly inviting regulatory, education, training, ethnic identifying, and other professional stakeholder groups to listen to updates regarding the Examination Program and to bring questions and concerns. Attendees asked questions and raised any concerns either during a live Q & A or by an option to send questions or concerns by email. Notably, very few concerns were raised either during, or in response to, these town hall meetings.

Unfortunately, during the town hall presentation, a remark was made indicating that the ESTAG had come to a consensus that the EPPP "met the Standards" [for Educational and Psychological Testing], when in fact the ESTAG's

discussion on this issue was more nuanced and complex. Moreover, the ESTAG had not yet submitted its formal report to the ASPPB Board and, therefore, the remark was a premature one. Board President Alan Slusky apologized (see Appendix) to the education and training community. A video recording of the town hall giving a comprehensive review of the status of the EPPP that had been distributed, was revised to remove this misstatement, and then redistributed: <https://vimeo.com/743463541/0991a45ead>. Unfortunately, two members of the ESTAG elected to resign following this misstatement.

The ESTAG submitted its final report on August 22, 2022 and it was reviewed by the ASPPB Board at its October Meeting. The ASPPB Board greatly appreciates the work of ESTAG and is moving to promptly implement actionable, detailed recommendations. The Board will nominate people to fill the two vacant positions as it expects ESTAG's ongoing work to contribute greatly to the evolution of the EPPP.

The ASPPB Examination Program's procedures and evidence are rigorous and align with all generally accepted licensure examination development standards, including critical and foundational standards outlined by the *Standards for Educational and Psychological Testing*.<sup>1</sup> An independent evaluation was recently conducted by the California Office of Professional Examination Services (OPES) as part of its mandate to ensure that all examination programs used in the California licensure process comply with psychometric and legal standards for the development of professional licensure exams. **This thorough independent review clearly stated that the EPPP (Part 1- Knowledge) and (Part 2- Skills) meets the Standards:**

OPES found that the procedures used to establish and support the validity and defensibility of the above examination program components of the EPPP Part 1 and Part 2 appear to meet professional guidelines and technical standards outlined in the Standards for Educational and Psychological Testing (2014) (Standards) and in California Business and Professions (B&P) Code § 139.

[https://psychology.ca.gov/about\\_us/meetings/materials/20211022\\_materials.pdf](https://psychology.ca.gov/about_us/meetings/materials/20211022_materials.pdf) pp. 103-143

**A two-part examination will not create new barriers to practice. Rather, it promises to smooth the road to licensure amidst a national mental health crisis.**

Amid a national mental health crisis driven in part by mental health provider shortages, the need for qualified providers has never been more important. ASPPB is committed to supporting an accessible, navigable, and efficient path to licensure for all qualified candidates. The EPPP (Part 2-Skills) was developed to assess the skills of individuals who desire to practice psychology. In other words, it assesses the work with which practitioners are actually tasked at the point of licensure. The methodology undertaken to develop the exam is sound, it involved over one hundred licensed psychologists in direct development, and it reflects the *minimum* level of skills that should be demonstrated to safely practice. Although all would agree that more mental health services are needed, the notion that the public should not expect these services to be delivered by individuals who have empirically demonstrated minimally competent knowledge and skills is dangerous.

Furthermore, prior to the development of the EPPP (Part 2- Skills), numerous jurisdictions had created their own versions of skills exams which varied significantly in terms of development, method, and content. Still other jurisdictions utilized oral examinations to assess skills, which risk being more subjective and subject to legal challenges. The EPPP (Part 2-Skills) provides for consistent assessment of skills across jurisdictions, based on industry standards. It is expected to *replace* current steps to licensure, *not* add to them. Nevada, for example, eliminated a state-specific skills exam by replacing it with the EPPP (Part 2-Skills).

Moreover, in service of supporting a streamlined approach to licensing qualified individuals, ASPPB's recommended timing for delivery of the EPPP (Part 1-Knowledge) is as soon as foundational coursework is completed and prior to or during internship. This timing allows candidates to take Part 1 of the exam at the point of knowledge acquisition (when pass rates are highest)<sup>2</sup> as is done with other doctoral level health professions. Part 2 would then be delivered at the point of licensure (as is currently the case). Therefore, no additional delays in achieving licensure are anticipated.

### **The development of a fair, equitable, and accessible exam is a core value of ASPPB.**

Significant time, energy, and resources have been put in place to develop processes and practices that reduce the chances of bias influencing exam performance<sup>3</sup>. These efforts have included:

- Intentional inclusion of a diversity of backgrounds, including race, ethnicity, and other identities; areas of expertise; and training backgrounds on all examination committees
- Training all item-writers to consider, among other things, cultural and linguistic issues
- In-person implicit bias training for all EPPP (i.e., Part 1- Knowledge and Part 2- Skills) item writers
- Repeated subject matter expert review of each item prior to appearing on an exam form, at multiple levels by several independent committees
- Pre-testing and statistical evaluation of *each* item prior to use as a scored item
- A statistical analysis, Differential Item Functioning (DIF), for each item across demographic variables
- Creation of an Item Review Committee (IRC) in 2020 to review those items identified by the DIF analysis for possible bias

Differential Item Functioning (DIF) analysis has been conducted since 2018 on each form of the EPPP. So far, over 1300 EPPP items have been subjected to DIF analyses. This process identifies items that perform differentially across demographic groups.

Next, any items that have been identified or flagged by the DIF analysis are reviewed by the 10-member Item Review Committee (IRC), an independent committee of psychologists with expertise in cultural competence, and experience working with underrepresented and marginalized populations. This committee was selected from well over 150 applicants. Items are reviewed blindly by committee members, and those that they deem potentially biased are removed from the exams.

To date, more than 1,300 items have been reviewed by DIF analysis; 34 items were flagged for review by the IRC. Committee members conducted a blind review of these 34 items and determined that 7 items should be omitted from the exam and item pool. This is an ongoing process, and DIF analyses will be conducted on every EPPP exam form going forward.

Although the current data suggest limited evidence of bias, ASPPB recognizes its responsibility in ensuring fair and equitable exams. This work must be multifaceted, ongoing, and expanded to eliminate inequities along the entire professional journey, beginning at recruitment, continuing through admissions and training, and ending in licensure. ASPPB will conduct future research on factors that may influence performance on the exam, will support test-takers in giving their best test performance, and will truly partner with stakeholders on research aimed at elucidating “the why” of differential performance across demographic groups.

ASPPB has also demonstrated its responsiveness to diversity and equity through a number of other actions. Although the ASPPB Board recognizes that these actions only represent a starting point, we wish to highlight examples of this work here:

- Regular education and outreach to the American Psychological Association of Graduate Students (APAGS) to assist students from diverse groups in understanding the licensure and examination process, including three presentations in 2022
- Consultation to A. Mihecoby and J. Thomas, authors of “*Lighting the Path*” to Psychology Licensure: *EPPP Handbook for Native Candidates*” published by The Society of Indian Psychologists
- Active participation in, and financial support for, the conference that culminated in the development of the Council of Chairs of Training Councils (CCTC) *Socially Responsive Toolkit* (2020)
- Ongoing work with CCTC to develop a network of PSYPACT holders to provide low-cost mental health services to graduate students in health service psychology programs
- Consistent with its commitment, approving financial support for students and early career psychologists through the:
  - 2022 National Multicultural Conference and Summit
  - 2022 Inez Beverly Prosser Scholarship for Women of Color, sponsored by PsiChi, The International Honor Society in Psychology

The ASPPB Board is actively exploring additional avenues to support successful licensure of candidates from under-represented racial and ethnically diverse backgrounds.

**A two-part examination of knowledge and skills ensures a thorough assessment of competence and is good for the protection of public health and welfare.**

At the point of licensure, regulatory boards have the responsibility to assess each individual applicant in real-time, to determine if they can safely practice psychology. Psychology has been an outlier among health care professions in not having had a standardized assessment of competency. Skills are not measured universally or in a standardized manner but instead through other methods such as supervisor ratings and letters of recommendation. The EPPP (Part 2-Skills) does, in fact, finally provide the measure that has been lacking. No better universal measure currently exists to ensure that a candidate demonstrates the minimal level of skills to practice independently, at a single point in time, across all expected profession-wide competencies (e.g., intervention and assessment, professionalism). This is particularly important given notable concerns raised by the training community that psychology trainees’ development of skills has been increasingly inconsistent. Recent concerns expressed by the Association of Psychology Internship and Postdoctoral Centers (APPIC) over the lack of adequate preparation of students for internship highlight these concerns and further argue for the need for an independent measure of competence to safely practice psychology.

**ASPPB is a non-profit organization that is mindful of cost and of responsibly stewarding its resources on behalf of the health and welfare of the public.**

We agree that the cost of education, and subsequent substantial educational debt, are enormous problems for students and may disproportionately impact first generation and low-income candidates. In response to concerns raised by stakeholders, students, and member jurisdictions, the Board has taken steps over the past 3 years in service of reducing the financial burden for test-takers. These actions have included:

- A 25% reduction in the EPPP (Part-2 Skills) fee, with no current plans to increase that fee
- Practice examinations that are now provided at-cost, so that candidates may access both in-person and on-line exams at minimal expense

ASPPB also expects that administering the EPPP (Part 1-Knowledge) at the point of knowledge acquisition (as is now recommended) will result in significant cost-savings for students who would otherwise pay for expensive third-party test-preparation materials. As noted above, the two-part format will allow for early admittance to the EPPP (Part 1-Knowledge) exam at the time of knowledge acquisition, a time when our research shows that pass-rates are higher <sup>2</sup>. Higher initial pass rates and less reliance on expensive test preparation companies are expected to mitigate costs substantially. ASPPB also expects that students who do not pass the EPPP (Part 1-Knowledge) at the time of knowledge acquisition will benefit from remediation while they are still in the training phase, while still in their programs with access to that remediation. Further, training programs will benefit from real-time feedback regarding students' preparation in the foundational knowledge required for internship readiness at the individual level, and accreditation at the program level.

ASPPB appreciates this opportunity to outline these changes which we believe will serve the public interest and benefit the profession of psychology. We invite you to share additional questions or concerns you may have via email at [asppb@asppb.org](mailto:asppb@asppb.org) or telephone at (678) 216-1175. Thank you.

---

## References

1. American Educational Research Association, American Psychological Association, and National Council on Measurement in Education, eds. (2014). *Standards for Educational and Psychological Testing*. Lanham, MD: American Educational Research Association.
2. Schaffer, J., Rodolfa, E., Owen, J., Lipkins, R., Webb, C., & Horn, J. (2012). The Examination for Professional Practice in Psychology: New data-practical implications. *Training and Education in Professional Psychology*. 6. 1-7. 10.1037/a0026823.
3. Turner, M. D., Hunsley, J., & Rodolfa, E. R. (2021). Appropriate validation standards for licensure examinations: Comment on Callahan et al. (2020). *American Psychologist*, 76(1), 165-166.



Supporting member jurisdictions in fulfilling their responsibility of public protection

**President**

Alan B. Slusky, PhD, CPsych

**Chief Executive Officer**

Mariann Burnett-Atwell, PsyD

**Past President**

Tomás R. Granados, PsyD

**President-Elect**

Herbert L. Stewart, PhD

**Secretary-Treasurer**

Cindy Olvey, PsyD

**Members at Large**

Michelle G. Paul, PhD

Hugh D. Moore, PhD, MBA

Jennifer C. Laforce, PhD, CPsych

**Associate Executive Officer****Member Services**

Janet P. Orwig, MBA, CAE

**Senior Director of Examinations****Services**

Matt Turner, PhD

**Director of Educational Affairs**

Jacqueline B. Horn, PhD

**Director of Professional Affairs**

Alex Siegel, JD, PhD

**Business Director**

Lisa M. Fagan, MBA

August 31, 2022

Dear Examination Stakeholder Advisory Group Members,

I am writing on behalf of the ASPPB Board of Directors to apologize for the recent incorrect and ill-timed statement made in ASPPB's video regarding the status of the EPPP. In one segment of the video, a remark was made that the ESTAG had come to consensus that the EPPP "met *The Standards*"<sup>1</sup>, when in fact the ESTAG's discussion on this issue was more nuanced and complex. Moreover, the ESTAG had not yet submitted its formal report to the ASPPB Board and, therefore, the remark was a premature one. We also recognize that the names and affiliations of ESTAG members were displayed in the video without providing the courtesy of advance notice. Lastly, we recognize that some have expressed concern that a response recently issued from ASPPB fell short of an apology. We are hopeful that this letter clearly communicates our sincere apology over what has happened.

Understandably, the trust that is so critical for collaboration between ASPPB and members of the ESTAG (and the stakeholder groups they represent) has been fractured. While we believe that this remark was not ill intentioned or malicious, we nevertheless take responsibility and regret the subsequent negative impact on ESTAG's membership and cohesion. In response to these concerns the video in question was immediately taken down, edited, and reposted without the statement or names and affiliations of ESTAG members. Further, we are committed to improving our processes to ensure that the work of ASPPB's committees and advisory groups is fully considered and represented before actions are taken.

The ESTAG was born out of ASPPB's desire, and the wishes of the psychology education and training community, to collaborate and advise the ASPPB Board on the ongoing development and validation of the EPPP. ASPPB did its best to intentionally constitute this working group with those who have expertise in psychometrics and those who are most critical of the examination. While advisory in nature, it was (and continues to be) our hope that the ESTAG would provide valuable outside perspectives on the exam, to ensure it continues to be a valid, reliable, and fair assessment of entry level knowledge and competence, so essential to the safe and ethical practice of psychology. Toward this end, we hope this error will not jeopardize ESTAG's continued work to meet its goals.

We understand that two members of ESTAG have elected to withdraw from the group in response. While we certainly respect their decisions, we



sincerely hope that they might either reconsider their decision or support their respective organizations in nominating individuals to take their place on this advisory group. ASPPB values the contributions that ESTAG has made and, we hope, will continue to make to the development and maintenance of the EPPP.

Finally, we remain open to dialogue with all members of the ESTAG over this or any other concerns it may have with regards to its efforts. We sincerely hope our efforts to acknowledge the error will facilitate rebuilding trust with this very important advisory group as well as the stakeholder communities it represents.

Sincerely,



Alan Slusky, Ph.D., C. Psych.  
President, ASPPB Board of Directors

CC:

Danielle Keenan-Miller, PhD  
Association of Psychology Training Clinics Council of Chairs of Training Councils  
Timothy Strauman, PhD  
Council of University Directors of Clinical Psychology

<sup>1</sup>American Educational Research Association, American Psychological Association, and National Council on Measurement in Education. (2014). Standards for educational and psychological testing. Washington, DC: Author.