

**NOTICE OF EXAMINATION FOR PROFESSIONAL PRACTICE IN PSYCHOLOGY
(EPPP) AD HOC COMMITTEE TELECONFERENCE MEETING****Friday, April 28, 2023**

9:30 a.m. – 5:00 p.m. or until completion of business

If Joining by Computer:

<https://dca-meetings.webex.com/dca-meetings/j.php?MTID=md4fe5fb6c958ab60da2984a9a85bc01b>

Webinar number: 2499 840 6777
Webinar password: BOP04282023

If Joining by Phone:

+1-415-655-0001 US Toll
Access code: 249 984 06777
Passcode: 26704282

The EPPP Ad Hoc Committee will hold the Committee meeting via WebEx as noted above. In accordance with Government Code section 11133, this meeting will be held by teleconference with no physical public location.

To avoid potential technical difficulties, please consider submitting any written comments by April 21, 2023, to bopmail@dca.ca.gov.

If you have trouble joining the call to listen or participate, please call (916) 574-7720.

Individuals seeking to receive Continuing Professional Development (CPD) credit for attending the Committee meeting via Webex will be required to provide their name and email to log into the meeting via Webex. Individuals who attend the Board meeting by phone will be required to email BOPCE@dca.ca.gov following the meeting, and provide their name, license number, and the phone number that was used to call into the meeting. The Board will use such information for purposes of logging and certifying attendance for CPD credit. Failure to provide this information may result in the Board being unable to verify attendance for CPD credit.

Members of the public who are not seeking to receive CPD credit for attending the Committee meeting may, but are not obligated to, provide their names or personal information as a condition of observing or participating in the meeting. When signing into the Webex platform, participants may be asked for their name and email address. Participants who choose not to provide their names will need to provide a unique identifier such as their initials or another alternative, so that the meeting moderator can identify individuals who wish to make public comment; participants who choose not to provide their email address may utilize a fictitious email address like in the following sample format: XXXXXX@mailinator.com

Action may be taken on any item on the agenda.

Committee Members

Sheryl Casuga, PsyD (Chair)
Seyron Foo
Mary Harb Sheets, PhD

Board Staff

Antonette Sorricks, Executive Officer
Jon Burke, Assistant Executive Officer
Brittany Ng, Board Counsel
Karen Halbo, Regulatory Counsel
Stephanie Cheung, Licensing Manager
Lavinia Snyder, Examination Coordinator
Mai Xiong, Licensing/BreEZe Coordinator
Troy Polk, Legislative and Regulatory Analyst
Sarah Proteau, Central Services Office Technician

AGENDA

9:30 a.m. – 5:00 p.m. or until completion of business

Unless noticed for a specific time, items may be heard at any time during the period of the Committee meeting.

The Committee welcomes and encourages public participation at its meetings. The public may take appropriate opportunities to comment on any issue before the Committee at the time the item is heard. If public comment is not specifically requested, members of the public should feel free to request an opportunity to comment.

- 1) Call to Order/Roll Call/Establishment of a Quorum
- 2) Chair Welcome
- 3) Public Comment for Items Not on the Agenda. Note: The Committee May Not Discuss or Take Action on Any Matter Raised During this Public Comment Section, Except to Decide Whether to Place the Matter on the Agenda of a Future Meeting [Government Code sections 11125 and 11125.7(a)].
- 4) Discussion and Possible Approval of the October 22, 2021, EPPP Ad Hoc Committee Meeting Minutes
- 5) Overview of the History of the EPPP – Part 2 (Skills) Exam
- 6) Discussion and Possible Approval of the EPPP – Part 2 (Skills) Exam Effective January 1, 2026
- 7) Discussion and Possible Recommendation Regarding Proposed Statutory and Regulatory Changes Required to Implement EPPP – Part 2 (Skills) Exam Effective January 1, 2026

- a) Business and Professions Codes (BPC) Sections 2940-2943
 - 1) BPC Section 2940 - License Application
 - 2) BPC Section 2941 - Examination Requirement
 - 3) BPC Section 2942 - Examination Development
 - 4) BPC Section 2943 - Examination Subjects

- b) Title 16, California Code of Regulations (16 CCR) sections 1381-1389.1
 - 1) 16 CCR section 1381 - Applications
 - 2) 16 CCR section 1387 - Supervised Professional Experience
 - 3) 16 CCR section 1387.10 - Supervision Requirements for Trainees who have Accrued Hours
 - 4) 16 CCR section 1388 - Examinations
 - 5) 16 CCR section 1388.6 - Satisfaction of Licensure Requirements
 - 6) 16 CCR section 1389 - Reconsideration of Examinations
 - 7) 16 CCR section 1389.1 - Inspection of Examinations

- 8) Recommendations for Agenda Items for Future Committee Meetings. Note: The Committee May Not Discuss or Take Action on Any Matter Raised During This Public Comment Section, Except to Decide Whether to Place the Matter on the Agenda of a Future Meeting [Government Code Sections 11125 and 11125.7(a)].

ADJOURNMENT

Action may be taken on any item on the agenda. Items may be taken out of order or held over to a subsequent meeting, for convenience, to accommodate speakers, or to maintain a quorum. Meetings of the Board of Psychology are open to the public except when specifically noticed otherwise, in accordance with the Open Meeting Act.

If a quorum of the Committee becomes unavailable, the chair may, at their discretion, continue to discuss items from the agenda and to vote to make recommendations to the full Committee at a future meeting [Government Code section 11125(c)].

The meeting is accessible to the physically disabled. To request disability-related accommodations, use the contact information below. Please submit your request at least five (5) business days before the meeting to help ensure availability of the accommodation.

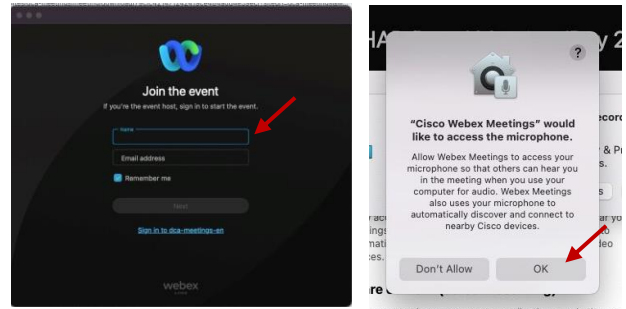
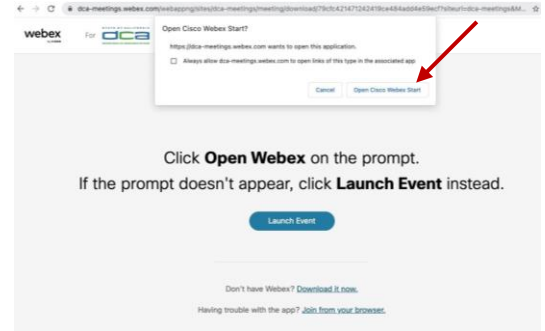
You may access this agenda and the meeting materials at https://www.psychology.ca.gov/about_us/meetings/index.shtml. The meeting may be canceled without notice. To confirm a specific meeting, please contact the Board.

Contact Person: Antonette Sorrick
1625 N. Market Boulevard, Suite N-215
Sacramento, CA 95834
(916) 574-7720
bopmail@dca.ca.gov

The goal of the EPPP Ad Hoc Committee is to review issues related to the Board's national examination.

If joining using the meeting link

- 1 Click on the meeting link. This can be found in the meeting notice you received.
- 2 If you have not previously used Webex on your device, your web browser may ask if you want to open Webex. Click "Open Cisco Webex Start" or "Open Webex", whichever option is presented. DO NOT click "Join from your browser", as you will not be able to participate during the meeting.
- 3 Enter your name and email address*. Click "Join as a guest". Accept any request for permission to use your microphone and/or camera.

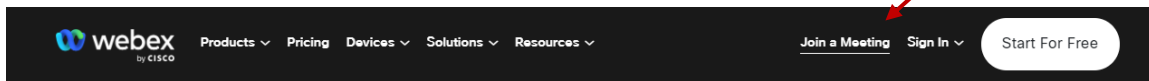


* Members of the public are not obligated to provide their name or personal information and may provide a unique identifier such as their initials or another alternative, and a fictitious email address like in the following sample format: XXXXX@mailinator.com.

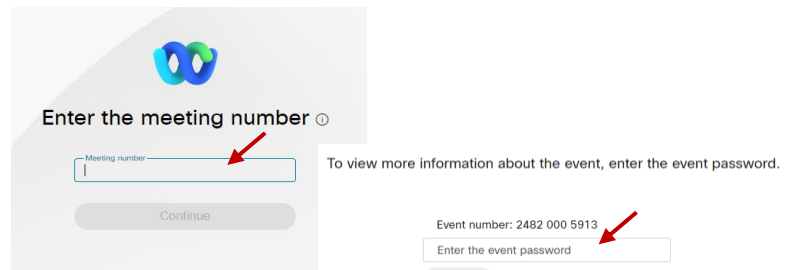
OR

If joining from Webex.com

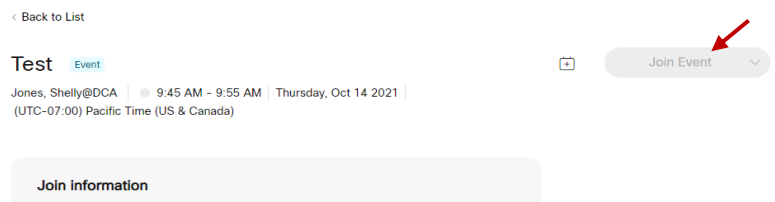
- 1 Click on "Join a Meeting" at the top of the Webex window.



- 2 Enter the meeting/event number and click "Continue". Enter the event password and click "OK". This can be found in the meeting notice you received.



- 3 The meeting information will be displayed. Click "Join Event".



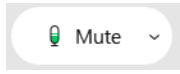
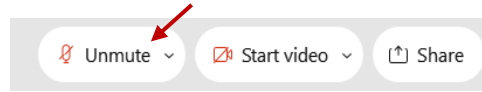
OR

Connect via telephone*:

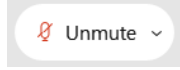
You may also join the meeting by calling in using the phone number, access code, and passcode provided in the meeting notice.

Microphone

Microphone control (mute/unmute button) is located on the command row.



Green microphone = Unmuted: People in the meeting can hear you.



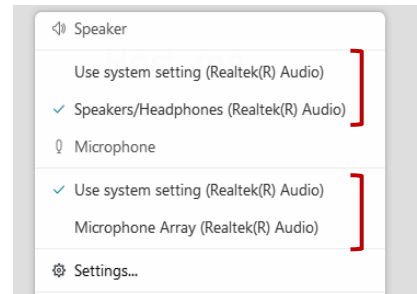
Red microphone = Muted: No one in the meeting can hear you.

Note: Only panelists can mute/unmute their own microphones. Attendees will remain muted unless the moderator enables their microphone at which time the attendee will be provided the ability to unmute their microphone by clicking on "Unmute Me".



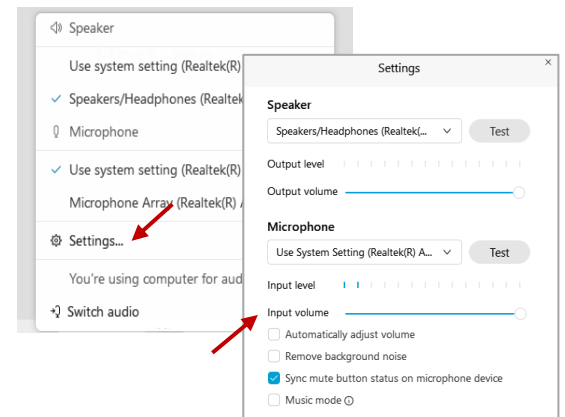
If you cannot hear or be heard

- 1 Click on the bottom facing arrow located on the Mute/Unmute button.
- 2 From the pop-up window, select a different:
 - Microphone option if participants can't hear you.
 - Speaker option if you can't hear participants.



If your microphone volume is too low or too high

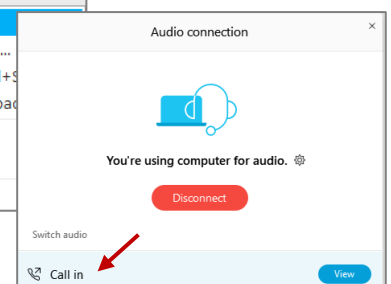
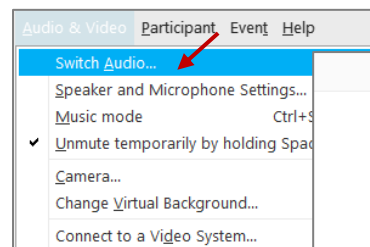
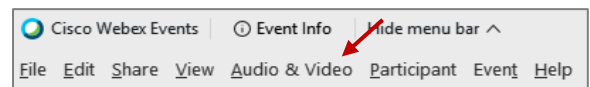
- 1 Locate the command row – click on the bottom facing arrow located on the Mute/Unmute button.
- 2 From the pop-up window:
 - Click on "Settings...":
 - Drag the "Input Volume" located under microphone settings to adjust your volume.



Audio Connectivity Issues

If you are connected by computer or tablet and you have audio issues or no microphone/speakers, you can link your phone through Webex. Your phone will then become your audio source during the meeting.

- 1 Click on "Audio & Video" from the menu bar.
- 2 Select "Switch Audio" from the drop-down menu.
- 3 Select the "Call In" option and following the directions.



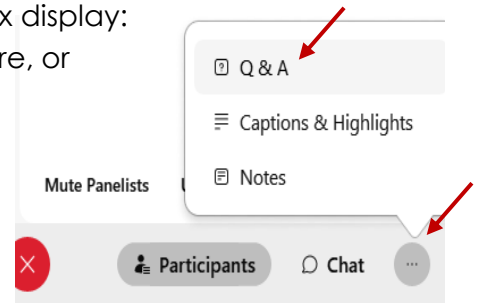
The question-and-answer (Q&A) and hand raise features are utilized for public comments.

NOTE: This feature is not accessible to those joining the meeting via telephone.

Q&A Feature

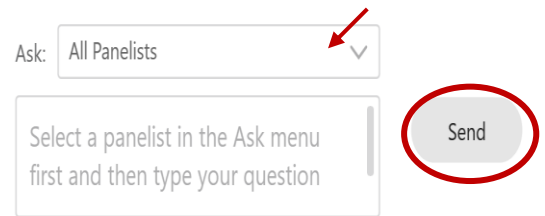
1 Access the Q&A panel at the bottom right of the Webex display:

- Click on the icon that looks like a “?” inside of a square, or
- Click on the 3 dots and select “Q&A”.



2 In the text box:

- Select “All Panelists” in the dropdown menu,
- Type your question/comment into the text box, and
- Click “Send”.



OR

Hand Raise Feature

- 1
- Hovering over your own name.
 - Clicking the hand icon that appears next to your name.
 - Repeat this process to lower your hand.

If connected via telephone:

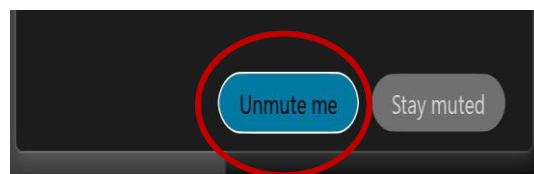
- Utilize the raise hand feature by pressing *3 to raise your hand.
- Repeat this process to lower your hand.

Unmuting Your Microphone



The moderator will call you by name and indicate a request has been sent to unmute your microphone. Upon hearing this prompt:

- Click the **Unmute me** button on the pop-up box that appears.

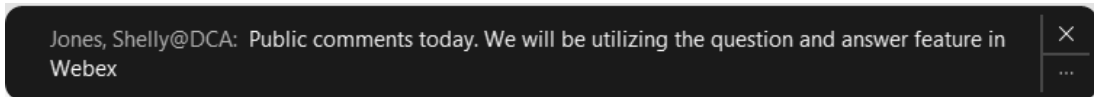


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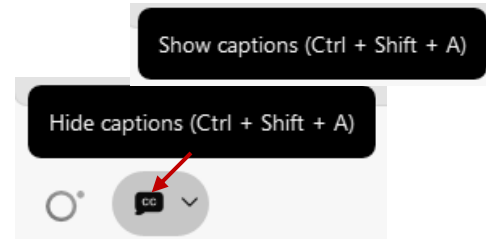
If connected via telephone:

- Press *3 to unmute your microphone.

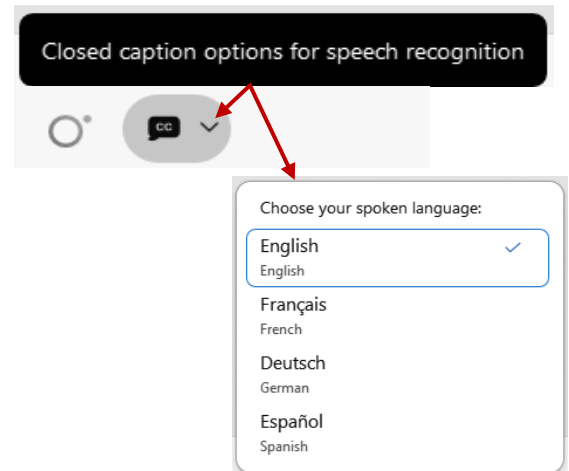
Webex provides real-time closed captioning displayed in a dialog box on your screen. The captioning box can be moved by clicking on the box and dragging it to another location on your screen.



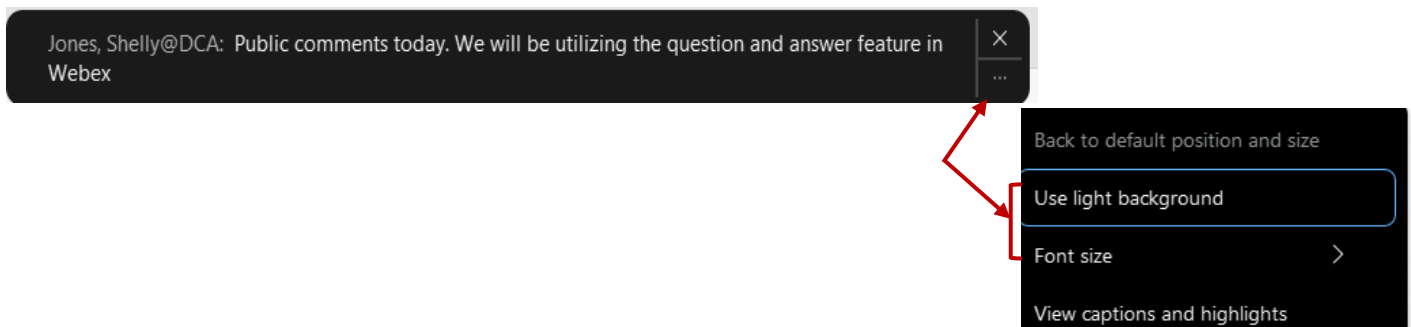
The closed captioning can be hidden from view by clicking on the closed captioning icon. You can repeat this action to unhide the dialog box.



You can select the language to be displayed by clicking the drop-down arrow next to the closed captioning icon.



You can view the closed captioning dialog box with a light or dark background or change the font size by clicking the 3 dots on the right side of the dialog box.



MEMORANDUM

DATE	April 13, 2023
TO	Licensure Committee Members
FROM	Sarah Proteau Central Services Technician
SUBJECT	Agenda Item 4 Discussion and Possible Approval of the October 22, 2021, EPPP Ad Hoc Committee Meeting Minutes

Background:

Attached are the draft minutes for the October 22, 2021, EPPP Ad Hoc Committee Meeting Minutes.

Attachment:

Draft minutes of the October 22, 2021, EPPP Ad Hoc Committee Meeting.

Action Requested:

Approve the attached minutes for the October 22, 2021, EPPP Ad Hoc Committee Meeting.

DRAFT MINUTES

**NOTICE OF EXAMINATION FOR PROFESSIONAL PRACTICE IN PSYCHOLOGY
(EPPP) PART 2 (SKILLS) ADHOC COMMITTEE MEETING**

Friday, October 22, 2021

Committee Members

Sheryl Casuga, PsyD (Chair)
Seyron Foo
Mary Harb Sheets, PhD

Board Staff

Antonette Sorrick, Executive Officer
Jonathan Burke, Assistant Executive Officer
Stephanie Cheung, Licensing Manager
Jason Glasspiegel, Central Services Manager
Sandra Monterrubio, Enforcement Manager
Lavinia Snyder, Examination Coordinator
Mai Xiong, Licensing/BreEZe Coordinator
Sarah Proteau, Central Services Technician
Rebecca Bon, Board Counsel
Heather Hoganson, Regulatory Counsel

Agenda Item 1: Call to Order/Roll Call/Establishment of a Quorum

Chairperson Casuga called the meeting to order at 9:30 a.m., roll was taken, and a quorum established.

Agenda Item 2: Chair Welcome

Dr. Casuga welcomed attendees and provided general housekeeping information as to how the meeting would proceed.

There was no Committee or public comment offered.

Agenda Item 3: Public Comment for Items Not on the Agenda. Note: The Committee May Not Discuss or Take Action on Any Matter Raised During this Public Comment Section, Except to Decide Whether to Place the Matter on the Agenda of a Future Meeting [Government Code sections 11125 and 11125.7(a)].

Dr. Casuga introduced this item.

47
48 There was no public comment offered.

49
50 **Agenda Item 4: Establish Committee Goal**

51
52 Dr. Casuga introduced this item and Ms. Snyder provided background on the Committee,
53 its previous name of the EPPP Part 2 Ad hoc Committee and the Committee goal as
54 stated in the Board's Sunset report. This goal was as follows: EPPP 2 Task Force - This
55 committee is comprised of two Board Members and relevant stakeholders.

56
57 Ms. Snyder provided staff recommendation to rename the Committee to be the EPPP Ad
58 Hoc Committee and revise the Committee goal as follows: The goal of the EPPP Ad Hoc
59 Committee is to review issues related to the Board's national examination

60
61 It was M/(Foo)/S(Harb Sheets)/C to change the Committee name and to establish the
62 Committee goal.

63
64 No Committee or public comment was offered.

65
66 Vote: 3 Ayes (Casuga, Foo, Harb Sheets), 0 Noes

67
68 **Agenda Item 5: Historical Overview of the EPPP (Part 2-Skills)**

69
70 a. Timeline of Examination

71
72 Ms. Snyder provided an update to this item including historical context on the Committee
73 related to the EPPP 2 Task force.

74
75 There was no Committee comment offered.

76
77 b. Correspondence between the Board of Psychology and the Association of State
78 and Provincial Psychology Boards (ASPPB)

79
80 Dr. Casuga introduced this item and Ms. Snyder noted that all correspondence related to
81 this item was included in the meeting materials and began on page 85.

82
83 Ms. Snyder stated this was for information only, with no action required.

84
85 Dr. Casuga stated that all questions could be presented as they came up in the agenda.

86
87 There was no Committee comment offered.

88
89 a. Identify Outstanding Issues

90
91 Dr. Casuga introduced and Ms. Snyder presented this item.

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93 Ms. Snyder stated the outstanding issues were:

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1. Lack of a proven necessity for the additional examination

2. Considerable concerns related to the examinations ability to assess skills as designed, and thus potentially providing negligible consumer protection

3. The additional examination costs and burden on prospective licensees, especially on historically underrepresented and socioeconomically disadvantaged students

4. The additional examination's creation of new barriers to licensure and potentially detrimental impact on access to psychological services to California consumers

5. Clarification on whether the optional Enhanced EPPP is an indefinite alternative or ASPPB is simply postponing the deadline for mandatory adoption. If the implementation date is merely being delayed, the Board would appreciate clarification on the anticipated date for mandatory implementation.

Ms. Snyder stated that the two main concerns raised by the Board were cost and lack of clarity from ASPPB as to whether Part 2 of the EPPP would remain optional or become mandatory.

She stated that there had been fee adjustments made for early adopters by ASPPB but those were due to expire at the end of 2021 and the fee would go up.

Dr. Turner, ASPPB, made a point of clarification that ASPPB had voted to extend the fee to remain at \$300 through 8/2023 at which point it would go up to \$450.

Dr. Harb Sheets presented a question to Dr. Turner as to whether licensees in jurisdictions that do not require the EPPP Part 2 would have option to take it.

Dr. Turner stated that he would bring up this information with the ASPPB Board.

Mr. Foo stated that ongoing public engagement was an essential part of the process of the Committee which had included Task Force members, stakeholders, heads of schools and students.

Dr. Casuga echoed the comments of Mr. Foo and stated that the goal would be to continue that effort of broad engagement going forward with the newly constituted Ad hoc Committee.

Dr. Casuga emphasized that Item 5 was for informational purposes only.

There was no further Committee and no public comment offered.

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Agenda Item 6: ASPPB Report on the EPPP (Part 2-Skills)

- a. Participating States
- b. Data from Initial Administrations

Dr. Casuga introduced this agenda item and welcomed Dr. Matt Turner, Senior Director with the Association of State and Provincial Psychology Boards (ASPPB).

Dr. Turner presented information as to the argument for a skill testing requirement to be able to prove a baseline competency to assess skills along with knowledge for providers.

Dr. Turner provided an example of what the testing would look like, detail of the beta testing, as well as a comparison of the EPPP part 1 and EPPP part 2 for contextual information.

Dr. Casuga referenced a letter in the materials on page 99 of the combined packet sent to ASPPB and the response from ASPPB CEO, Dr. Mariann Burnett-Atwell.

Dr. Harb Sheets expressed appreciation to Dr. Turner for the presentation and asked if there was any more information that could be shared from early adopters of the EPPP Part 2.

Dr. Turner provided feedback from pilot testing of the exam and the early entry option.

Mr. Foo thanked Dr. Turner asked how the skills exam would differ from the skills obtained through supervised experience.

Dr. Turner responded that currently there was not a standardized way to evaluate skill, and this could provide a pathway, nationally.

Dr. Harb Sheets asked how differing focuses of graduate study were taken into account in exam development.

Dr Turner stated that it had been reviewed by a wide group of participants that provide a broad perspective.

Dr. Casuga presented a question about bias mitigation and referred to page 102 of the meeting materials which stated, "...to date no items have been removed due to bias". Dr. Casuga emphasized that bias can be difficult to pinpoint and that she was concerned that some information may not be being caught. She commented that that type of testing disproportionately shows different results for different groups and expressed her concern that there may be confirmation bias in the process of development.

185 Dr. Turner responded that the process was relatively new and that they expected they
186 would probably find something that had some risk for bias. He stated that the experts
187 were looking closely for bias.

188
189 Dr. Turner stated that differential pass rates could indicate bias and could be an indicator
190 of societal things marginalized groups that are dealing with every day. There can be many
191 things that contribute to a differential pass rate which is why there is a flagging procedure.
192 He stated that there is an emphasis on making sure that items are sound, and effort is
193 made to eliminate bias and maintain sensitivity to the varied issues.

194
195 Dr. Casuga commented that many fields are moving into competency based and a
196 combination of skills/knowledge and asked why create a second test instead of altering
197 the first test to make one exam for all things?

198
199 Dr. Turner responded that there was too much information to include in one 4-hour exam
200 to provide legally defensible assessment.

201
202 Public comment

203
204 Dr. Marilyn Immoos queried as to whether respondents are included that are of an older
205 generation and spoke of the issue of age discrimination.

206
207 Dr. Turner clarified that there have been a wide variety of contributors that have been and
208 will continue to be a part of the process as well as accommodations that would be
209 available.

210
211 Dr. Willow Pearson, Director of Clinical Training at the California Institute for Integral
212 Studies, asked about regionally accredited programs and if students from such programs
213 would be able to take the exam prior to graduation. She stated that the additional cost
214 would be burdensome to students and licensees and that the test has not been proven.

215
216 Dr. Turner clarified that the determination to test early would be up to the jurisdiction or
217 licensing authority. He clarified that OPES had reviewed the EPPP Part 2 test and it does
218 meet the standards for validation and respectfully disagreed with the comment.

219
220 Dr. Elizabeth Winkelman, California Psychological Association (CPA), queried if EPPP
221 Part 2 were to be adopted in CA, would that require a change in laws and regulations and
222 if there had been any proof it is needed? She stated that CPA members had expressed
223 concern regarding barriers and referenced an article posted from the American
224 Psychological Association addressing disadvantages for marginalized groups

225
226 Dr. Harb Sheets addressed the first question and stated that this would need to be looked
227 at, but the laws and regulations only reference the EPPP.

228
229 Dr. Turner stated that many jurisdictions have eliminated oral exams as not being
230 defensible but still need a way to assess skills.

231
232 Sheri Johnson, Professor of Psychology at UC Berkeley, echoed Dr. Winkelman's
233 comment on issues of diversity and asked how data would be provided when collected
234 on pass rates.

235
236 Dr. Turner confirmed that it would be available for review.

237
238 Dr. Cindy Yee-Bradbury from UCLA addressed difficulties of data collection when relying
239 on the early adopters which may limit ability to gather data from a varied group.

240
241 Dr. Turner stated these were worthy things to pursue.

242
243 Dr. Marilyn Immoos, echoed necessity of diversity within the field and issues with access,
244 financial impact and would like to receive additional data when available.

245
246 Dr. Casuga expressed appreciation to Dr. Turner for the presentation and his availability
247 to answer questions and to participants for their comments on diversity and intent of equity
248 for marginalized populations.

249
250 Mr. Foo asked about PSYPACT and how that would be affected if the EPPP Part 2 were
251 implemented.

252
253 Dr. Turner stated that there would have to be a decision made but it was speculative at
254 that point.

255
256 Dr. Casuga thanked everyone for the discussion and stated that this was informational
257 only, with no action required.

258
259 There was no further Committee or public comment offered.

260
261 **Agenda Item 7: General Input Regarding the EPPP (Part 2-Skills)**

262
263 Dr. Casuga introduced this item.

264
265 There was no Committee or public comment offered.

266
267 **Agenda Item 8: DCA's Office of Professional Examination Services (OPES) Status**
268 **Report of the EPPP Audit**

269
270 Dr. Casuga introduced this item and Dr. Tracy Montez and Amy Welch Gandy to present
271 this item, which began on page 103 of the meeting materials.

272
273 Ms. Welsh Gandy presented on how OPES evaluates testing by comparing national
274 exams and provided evaluative data collected from the national exam and California
275 exams to determine if there was anything not covered within the national that was
276 adequate for California.

277
278 She stated that the CPLEE was determined by OPES to still be needed as the EPPP Part
279 1 did not address California specific laws and did not cover ethics.

280
281 Ms. Welsh Gandy concluded that the EPPP 1 and 2 met psychometric standards; Part 1
282 was a sufficient knowledge-based exam but did not assess skills or California law and the
283 CPLEE should continue to be used and that the Board continue to monitor the beta testing
284 results of the EPPP Part 2 as part of the decision-making process for adopting it as a
285 requirement for licensure.

286
287 Mr. Foo queried about content validity and external validity and asked Dr. Montez why
288 external validity was not something that was looked at by OPES when evaluating an
289 exam.

290
291 Dr. Montez stated that content validity is the most objective and neutral type of evidence
292 with regulatory exams; what you do on the job, the knowledge you are required to know
293 on the job. The test is developed that way so regardless of the occupation or the state,
294 whether it's an association or state-based exam, OPES is primarily looking at content
295 validity and that is the primary evidence that they will gather.

296
297 Dr. Harb Sheets asked for clarification on whether the accreditation that was given in the
298 report was APA or regional accreditation.

299
300 Dr. Turner stated that the information had referred to APA or the Canadian equivalent.

301
302 Discussion ensued between Dr. Harb Sheets and Ms. Welsh Gandy about supervised
303 experience and if it could adequately assess applicant skills for them to practice safely
304 and competently.

305
306 Ms. Welsh Gandy stated that OPES had looked at supervised experience and that the
307 subject matter experts had been concerned about additional barriers to licensure and
308 discussed that the skills could potentially continue to be assessed via supervision.

309
310 There was no public comment offered.

311
312 Dr. Casuga expressed appreciation to all attendees for participation.

313
314 **Agenda Item 9: Recommendations for Agenda Items for Future Board Meetings.**
315 **Note: The Committee May Not Discuss or Take Action on Any Matter Raised During**
316 **This Public Comment Section, Except to Decide Whether to Place the Matter on the**
317 **Agenda of a Future Meeting [Government Code Sections 11125 and 11125.7(a)].**

318
319 Ms. Sorrick asked for possibility to convene again.

320
321 It was announced that Dr. Casuga would be reporting on this Committee meeting at the
322 November Board meeting

323

324 There was no public comment offered.

325

326 **ADJOURNMENT**

327

328 The committee meeting adjourned at 12:40 p.m.

329

DRAFT

MEMORANDUM

DATE	April 28, 2023
TO	EPPP ADHOC Committee Members
FROM	Lavinia Snyder Examination Coordinator
SUBJECT	Agenda Item #5: Overview of the History of the EPPP – Part 2 (Skills) Exam

In 2017, Dr. Stephen Phillips, then President of the Board of Psychology (Board), determined that there was a need for stakeholder input regarding possible implementation of the Association of State and Provincial Psychology Boards (ASPPB) Examination for Professional Practice in Psychology Part 2 (EPPP2). A Task Force with representatives from various stakeholders was created to provide input to the Board regarding consideration and possible implementation of the EPPP Part 2. The Task Force's role was to consider the pros and cons of the proposed examination to the Board's prospective licensees and consumers, eligibility criteria, the application process, and the impact on the Board's process for licensure. The Task Force met on April 5th and June 29, 2018 at the Department of Consumer Affairs' (DCA's) Headquarters in Sacramento. This Task Force was chaired by Board Member Dr. Sheryll Casuga.

The Examination for Professional Practice in Psychology, currently known as the EPPP Part 1 (Knowledge), is a computer-based examination developed and administered by ASPPB. This exam is one of two examinations required for licensure in California. The cost of the exam to the applicant is \$600.00.

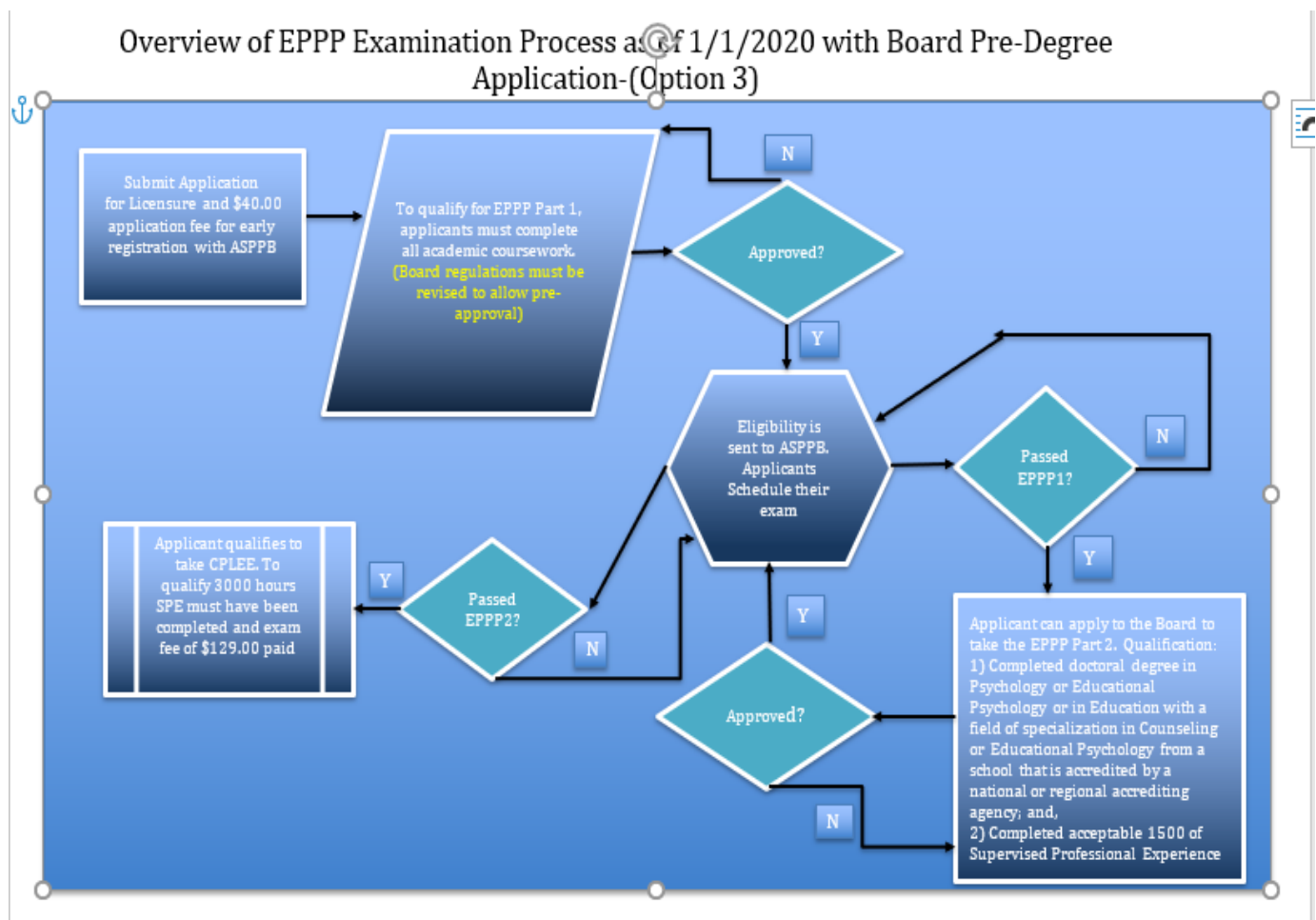
EPPP Part 2 (Skills exam), per ASPPB, will provide an independent, standardized, reliable, and valid assessment of the skills necessary for independent practice and enhance consumer protection. The cost of this exam was initially set at \$600.00. ASPPB, at the time of the initial Task Force meeting, announced the plan to make this exam mandatory for all jurisdictions.

After several discussions, the Task Force did not believe the EPPP Part 2 was in the best interests of California consumers for the following reasons:

- Lack of a proven necessity for the examination;
- Concerns related to the exam's ability to assess skills resulting in negligible consumer protections;
- Costs and burden on prospective licensees, and especially on historically underrepresented and socioeconomically disadvantaged students;

- New barriers to licensure and potentially detrimental impact on access to psychological services to California consumers; and
- Clarification on whether the optional Enhanced EPPP is an indefinite alternative or ASPPB is simply postponing the deadline for mandatory adoption. If the implementation date is merely being delayed, the Board would appreciate clarification on the anticipated date for mandatory implementation.

The Task Force also had significant concerns with the loss of license portability with other States if ASPPB decided to mandate the EPPP Part 2. Due to this concern, the Task Force recommended (should part 2 become mandatory) that the Board continue participation in the EPPP, and not create its own version of a national examination. To that end, the Task Force recommended implementation of what was presented as Option 3 (below),



In August 2018, ASPPB retracted its decision and made the EPPP Part 2 an optional exam for all state boards and proposed incentives for early adopters. Although ASPPB's announcement clarified that the EPPP Part 2 was now an optional component, it did raise concerns regarding whether ASPPB would eventually make the examination mandatory.

In a letter dated October 24, 2018, ASPPB detailed enhancements regarding the implementation of the EPPP moving forward. They are as follows:

- 1) "ASPPB rescinded its original decision back in August 2017 which made the Enhanced EPPP (including both knowledge and skills portions) a single licensure exam. EPPP2 became a two-option exam.
- 2) Option One is for jurisdictions to continue to use the current EPPP, a standardized assessment of the knowledge needed for independent practice, with jurisdictions determining their own method of assessing the skills needed for independent practice.
- 3) Option Two is to use the Enhanced EPPP, which will be available in January 2020. The Enhanced EPPP will be one exam with two parts: the current EPPP, the standardized assessment of knowledge and the Part 2 of the EPPP, the standardized assessment of skills.
- 4) An applicant must pass the knowledge portion of the exam (the current EPPP) prior to taking the skills portion of the exam (the Part 2 of the EPPP). The skills exam will not be offered as a standalone exam
- 5) Only applicants who are registered through a jurisdiction that has adopted the Enhanced Exam, and who have passed the knowledge portion of the exam, will be allowed to take the skills portion of the exam.
- 6) January 1, 2020 through December 31, 2021 is designated as an early adoption period. All jurisdictions who decide to adopt the Enhanced EPPP at any point during this time frame will be offered reduced fees for their applicants.
- 7) Fees for the skills portion of the exam, not including test center and jurisdictional fees will be at \$450 as of January 1, 2022.
- 8) ASPPB Exam Fees for Beta Testers, not including test center and jurisdictional fees will be at \$100.00.
- 9) Beta testing is commonly used for professional licensing exams and ASPPB has conducted Beta Testing in the past for both the EPPP and the PEP. One of the goals of beta testing is to assess how each item performs. Typically, many items are found to be psychometrically sound and are included in the applicant's score, while some items do not perform well and are discarded. Because of the need to assess items, longer examinations are given during the beta testing time frames. Items that do not perform well are not used to determine a candidate's score.
- 10) Beta testers: Approximately 150 initial test-takers will be "beta testers." Beta Testing will occur for approximately two months starting at exam launch. Beta testers do receive an exam score; however, they may need to wait a bit longer than is now typical to receive their score.
- 11) One of ASPPB's commitments is to strive towards best practices and consistency in regulation. Towards that end we anticipate that as jurisdictions adopt and gain experience with the Enhanced EPPP, they will come to see its value, such that at some point, as was the case with the EPPP, all jurisdictions will adopt it as the licensure exam for psychology. Expect continued support from ASPPB in efforts to implement the Enhanced EPPP. After several years of experience of jurisdictions using the Enhanced EPPP (2022), the ASPPB Board of Directors will evaluate that experience and decide on future directions for the national licensing exam. That decision will not be made in isolation and without the ongoing input of our member jurisdictions.

- 12) ASPPB strongly supports an early admittance option which would allow students to take the knowledge portion of the EPPP (Part 1) pre-degree after completion of all academic coursework excluding internship and research. The early admittance option will only be allowed for candidates who are registered through an Enhanced EPPP jurisdiction and is not limited to those coming from accredited programs, rather it is the jurisdictions that will make the determination of eligibility.
- 13) Enhanced EPPP jurisdictions will decide whether they will allow for this option. Students will need to check with jurisdictions to see if they will allow for an early option and if they will accept EPPP scores if taken early.”

The Task Force recommendations and update from ASPPB were presented at the November 2018 Board meeting. Although the Board welcomed the enhancements made by ASPPB, the Board continued to have concerns which were addressed in the letter dated December 2018 which stated as follows:

“The Board of Psychology supports a competency-based examination but feels that certainty is required as to its mandatory implementation, and that a date certain for all member jurisdictions is necessary. Uncertainty as to implementation results in a current inability to move forward with the required statutory and regulatory changes.

ASPPB would aid its member jurisdictions if it were to identify all statutory and regulatory changes needed to implement the new examination (drafting and supporting statutory and regulatory changes through advocacy, etc.) over a set period of time calibrated to the expected implementation date and the time necessary to effect needed changes.

ASPPB should continue to evaluate the total cost of both examinations and establish a uniform lower total cost as to all jurisdictions, as of the mandatory effective date of the Enhanced EPPP.

In addition, the Board also requests that ASPPB make available to the Board and the Department of Consumer Affairs' Office of Professional Examination Services the following information as it becomes available:

- *Data from Beta testing from participating jurisdictions to evaluate the validity of the Enhanced EPPP.*
- *Evidence of external validity that substantiates the need for the Enhanced EPPP. This information would help further clarify the need for and validity of the Enhanced EPPP and inform the Board's discussion regarding the prospect for adoption of the Enhanced EPPP.”*

ASPPB's response was noted in a letter (Attachment B) dated January 29, 2019. Summarily, ASPPB Board of Directors (BOD) had determined that the jurisdictional use of the Enhanced EPPP would not be mandated during the initial implementation process. The BOD, however, would revisit the implementation process of the examination and determine whether or not to continue delivering the EPPP 1 as a stand-alone option or

only to deliver the Enhanced EPPP. They would take into consideration the time it takes for California to develop and implement regulation changes and factor that into their decision.

ASPPB also reduced the exam fee for the EPPP2 from \$600.00 to \$450.00.

The Board also requested beta testing information from participating jurisdictions to enable the Department of Consumer Affairs, Office for Professional Examination Services (OPES) to conduct an audit of the EPPP. The audit was completed and an EO summary provided in April 2021 (Attachment C). It concluded:

“Overall, the SMEs concluded that the content of the EPPP Part 1 assesses general knowledge required for entry level psychologist practice in California, with the exception of California law and ethics. This general knowledge should continue to be tested on the California Psychology Law and Ethics Examination.

The SMEs were impressed by the EPPP Part 2, both by the concept of measuring skills and by the design of the scenario-based items. Additionally, the SMEs favored the EPPP Part 2 over the EPPP Part 1 as a single-examination option. However, the SMEs concluded that while the EPPP Part 2 assesses a deeper measure of skills than those measured by the EPPP Part 1, that alone may not support adoption of the EPPP Part 2. The SMEs further concluded that the skills measured by the EPPP Part 2 may be adequately assessed during supervised clinical experience, and that the EPPP Part 2 could possibly be an unnecessary barrier to licensure. OPES recommends that the Board continue to monitor the beta testing results of the EPPP Part 2 as part of their decision-making process for adopting the EPPP Part 2 as a requirement for licensure in California in the future.”

This audit was presented at the EPPP ADHOC Committee meeting held on October 21, 2021. However further discussion could not be made until the ASPPB Board of Directors decided on their plan for the EPPP2.

In October 2022, the ASPPB Board of Directors announced the implementation of the Enhanced EPPP two-part exam to become effective 1/1/2026 to all member jurisdictions. The announcement and factual overview (Attachment D) are attached for review. ASPPB is committed to addressing concerns regarding the exam. They do not believe that the EPPP2 will create a barrier to practice and promises to smooth the road to licensure amidst a national mental health crisis. ASPPB’s core value is to develop a fair, equitable and accessible exam and that the two-part exam ensures a thorough assessment of competence and promote consumer protection. They will be mindful of the cost and confirmed a 25% reduction in the EPPP2 fee with no current plans to increase the fee. After the announcement, the Board received several letters of opposition and one in favor of implementing the EPPP2. Copies are attached for your review (Attachment E & F).

Attachment:

Attachment A: Full Report of the EPPP Part 2 Task Force

Attachment B: January 29, 2019 letter from ASPPB

Attachment C: EO Summary of OPES Audit of the EPPP

Attachment D: October 2022 ASPPB's Announcement regarding the Enhanced EPPP and Factual Overview

Attachment E: Letters of Opposition

Attachment F: Letter in Favor

Action Requested:

No action required. Informational purposes only.

**Examination for Professional Practice
in Psychology Part 2 (EPPP2)
Task Force**

Task Force Report

July 30, 2018



EPPP2 Task Force Members

Member Name	Organization Represented
Dr. Sheryll Casuga	Task Force Chair, Board of Psychology, Board Member
Seyron Foo	Board of Psychology, Board Member
Dr. Andrew Harlem (Alternate: Dr. Allison Briscoe-Smith)	California Institute of Integral Studies
Dr. Olga Belik	California Psychological Association (CPA) Division II
Crystal Faith Cajilog (Alternate: Katherine Kruser)	California Psychological Association of Graduate Students (CPAGS), Chair
Rene Puliatti	CAPIC, Executive Director
Dr. Paul Marcille	CPA President
Sherri Sedler	CPAGS, School Representative for Cal Southern University
Anushree Belur	CPAGS, School Representative for The Chicago School of Professional Psychology
Alejandra Ojeda-Black	CPAGS, School Representative for UC Berkeley
Amy Welch-Gandy	DCA/OPES
William Bloxham	JFK University (CPAGS, Student representative for JFK University)
Dr. Jay Finkelman	The Chicago School of Professional Psychology, I-O Business Psychology, Professor and Chair
Dr. Sherry Johnson (Alternate: Dr. Cindy Yee-Bradbury)	UC System
Dr. Gilbert Newman (Alternate: Dr. Lani Chow)	Wright Institute

Origin and Purpose of the Task Force

In Fall of 2017, Dr. Stephen Phillips, President of the Board of Psychology (Board), determined that there was a need for stakeholder input regarding possible implementation of the Association of State and Provincial Psychology Boards (ASPPB) Examination for Professional Practice in Psychology Part 2 (EPPP2), which was still under development, and it was decided that a Task Force with representatives from various impacted stakeholders would be best to provide the necessary input to the Board.

The purpose of the EPPP2 Task Force, as provided by Dr. Phillips, was to provide stakeholder input for the consideration and possible implementation of the EPPP Part 2. The task force was tasked with considering the benefits and drawbacks of the proposed examination for the Board, prospective licensees, and consumers, eligibility criteria, the application process, and the impact on the Board's process for licensure.

Task Force Meetings

The EPPP2 Task Force met on April 5, 2018 and June 29, 2018 at DCA's Headquarters in Sacramento, CA. The meetings were chaired by Dr. Sheryl Casuga (Chair), both meetings were open to the public, had a quorum of Task Force members present, and due notice had been sent to all interested parties prior to the meeting. See Appendix D and E for meeting minutes/draft meeting minutes from the respective meetings.

ASPPB Background and Necessity for the EPPP Part 2

At the EPPP2 Task Force’s April meeting, Dr. Matt Turner, Director of Examination Services for ASPPB, and Dr. Emil Rodolfa, Chair of ASPPB’s Examination for Professional Practice in Psychology Part 2 Implementation Task Force, provided the EPPP2 Task Force with a presentation on the need for, development process of, sample test questions in Part 2 of the examination. The current Examination for Professional Practice in Psychology (soon to be EPPP Part 1) is a computer-based examination developed and proctored by ASPPB, passage of which is required for licensure in all but one state/territory in the United States. ASPPB stated that the EPPP Part 2 will enhance consumer protection and provide an independent, standardized, reliable, and valid assessment of the skills necessary for independent practice. ASPPB also stated that EPPP Part 2 would be considered mandatory and that they could not in a legally defensible way provide these as standalone tests with EPPP Part 2 being optional.

EPPP Examination Basic Information		
	EPPP Part 1	EPPP Part 2
Content of Exam is Designed to Assess	Basic Knowledge Required of a Newly Licensed Practitioner to Practice Independently	Basic Skills Required of a Newly Licensed Practitioner to Practice Competently and Independently
Eligibility Criteria	Currently: Board of Psychology Eligibility Approval (Degree Completion and 1500 Hours Supervised Professional Experience) ASPPB Proposal: Board of Psychology Eligibility Approval and/or Coursework Completion at an APA Approved Degree Program	ASPPB Proposed: Board of Psychology Eligibility Approval
Exam Format	Computer-based multiple choice	Computer-based, varied question types including avatars
Exam Cost	\$600	\$600

According to ASPPB, Part 2 of the EPPP was created because of the following factors:

- A move towards a culture of competence and corresponding lack of a standardized reliable method for determining competency due to the lack of standardization in graduate education and practicum training hours;
- Concerns over the reliability and validity of supervisor’s written assessments of the competency of their trainees; research has shown a trend of overestimating supervisee competence and that supervisors have difficulty writing critical or constructive letters;
- The technology now exists to create a cost-efficient and computer-based examination to test the functional skills necessary for independent practice; and
- Having a skills examination that assesses competency puts Psychology in line with other healthcare professions.

(Taken from ASPPB’s presentation (Appendix A) and ASPPB’s report “The EPPP Part 2, The Assessment of Skills Needed for the Independent Practice of Psychology” (Appendix B))

Additionally, Dr. Turner and Dr. Rodolfa discussed the logic of moving the timeframe for when applicants would take the knowledge portion of the examination (EPPP Part 1) to earlier in the process and their reason for proposing to allow exam eligibility directly from ASPPB for pre-degree completion applicants from American Psychological Association (APA) approved degree programs.

The EPPP2 Task Force members asked Dr. Turner and Dr. Rodolfa a wide range of questions relating to the new part of the examination, including questioning the necessity of the new part of the examination, the structure and design of the examination and its question formats, the development process for the examination, and various questions about reliability and validity (content vs. predictive) for a skills examination. EPPP2 Task Force members also relayed to Dr. Turner and Dr. Rodolfa the following concerns:

- That the necessity of the new examinations was not well established and questioning the perceived deficiencies the new examination was supposed to be correcting;
- Worries that additional time and test preparation materials and classes would be needed by students to pass the new part of the examination
- The appropriateness of the new timeline for taking each part of the examination, as offered by ASPPB, and whether this would create negative effects on graduate programs, internship programs, and additional pressure and time constraints on students who would need to prepare for Part 1 of the examination earlier in their program.
- The reality that doubling the cost of the entry examinations would create additional barriers to licensure and further reduce access to care by licensed psychologists within California, especially for students from historically underrepresented populations and socio-economically disadvantaged students.
- The serious market inequity that providing only APA students early and direct eligibility for Part 1 of the examination creates.

Since Dr. Turner and Dr. Rodolfa could not speak on behalf of ASPPB's Board of Directors regarding all of the Task Force's concerns or the ASPPB Board's willingness to consider making changes to the costs, eligibility criteria, implementation timeline, and roll-out of the EPPP Part 2, the Task Force instructed Board staff to send a letter with its questions to the ASPPB Board of Directors. The Task Force members were able to review ASPPB's responses to their questions at the Task Force's second meeting. On the whole, ASPPB's answers to the Task Force's concerns did not wholly address Task Force concerns. The Task Force's Letter and ASPPB's response can be found in Appendix C.

Upholding the Best Interests of California Consumers of Psychological Services and Prospective Licensees

During the Task Force's discussion of whether implementation of the EPPP Part 2 was in the best interest of California consumers of psychological services and prospective licensees, the following concerns were discussed:

- Uncertainty regarding whether the EPPP Part 2, from what Task Force members were shown regarding test design, would enhance consumer protection as Task Force

members did not believe the design of the EPPP Part 2 would accurately assess skills and ensure competency.

- Potentially detrimental impact on California consumer's already limited access to psychological services if the implementation of EPPP Part 2 creates additional significant barriers to entering the profession and licensure, especially for historically underrepresented populations and socio-economically disadvantaged students.
- Questionable value-added benefits (enhanced consumer protection and ensure competency) to outweigh the significant costs (financial costs and time burden on prospective licensees and detrimental impacts to access to care for consumers).
- Apprehension that the California psychology license would be diminished and potentially become less portable across other states and territories if California chose to create its own general knowledge examination and opt out of participation in the EPPP altogether.

During this discussion, the Task Force was made aware that as it stood during the two Task Force meetings, participation in EPPP Part 2 was not optional according to ASPPB. Thus, not implementing EPPP Part 2 would mean opting out of participation in EPPP as a whole, both the knowledge and skills parts, and force the Board to create their own general knowledge examination. Significant problems with California creating its own examination were provided verbally to the Task Force as follows:

- Significant costs and startup time needed to develop and implement the examination, which may not be a politically feasible solution acceptable to the Administration and Legislature in authorizing the funding;
- Reduction in licensure portability, as states and territories other than California will not administer the same examination, and therefore California licensees would not meet the criteria for licensure set by other states and territories, thus hindering licensees when they apply to become licensed elsewhere.

From these discussions, a general consensus emerged that due to the uncertainty of the information available to the Task Force on examination design and components, that implementation of the EPPP Part 2 by the 2020 deadline was not in the best interest of California consumers of psychological services and prospective licensees. However, the alternative of the Board abandoning the EPPP altogether and creating its own general knowledge exam was neither desirable due to its potential to diminish license portability nor feasible due to the significant costs (both with time and finances) for the Board and State.

EPPP Part 2 Effects on Examination Sequencing and the Initial Licensure Process

To show the effects of the EPPP Part 2 on the examination sequencing and length of the initial licensure process, Board staff developed a comparison chart (below) and four detailed flow charts to show the current examination sequencing required for licensure and three (3) potential implementation options incorporating EPPP Part 2 that could be instituted with/without statutory and regulatory changes depending on the option. What became apparent through the comparison charts is the inequity and delays in licensure, and thus market disadvantage, that Implementation Option 1 created for California applicants compared to out of state applicants, and Implementation Option 2 created for California applicants in non-APA approved programs compared to in-state applicants from APA approved schools or out of state applicants.

Chart 1. Comparison Chart of the Three EPPP Part 2 Implementation Options

EPPP Examination Process as of 1/1/2020 without changes to the Regulations (Option 1)	EPPP Examination Process as of 1/1/2020 with ASPPB Pre-Registration (Option 2)		EPPP Examination Process as of 1/1/2020 with Board Pre-Registration (Option 3)
All Applicants	Non-APA approved program students	APA approved program students	All Applicants
Coursework Completion	Coursework Completion		Coursework Completion
		Pre-application directly to ASPPB	Submit application and application fee for Licensure to the Board
		Schedule and Pass EPPP Part 1	Approval by the Board for EPPP Part 1 if applicant has completed all academic coursework
		Submit an application and application fee for Licensure	Schedule and Pass EPPP Part 1
Doctoral Degree Completion	Doctoral Degree Completion	Doctoral Degree Completion	Doctoral Degree Completion
1500 Supervised Professional Experience	1500 Supervised Professional Experience	1500 Supervised Professional Experience	1500 Supervised Professional Experience
Submit application and application fee for Licensure to the Board	Submit an application and application fee for Licensure	Take and pass EPPP Part 2	Submit application to apply for the EPPP Part 2
Take and Pass EPPP Part 1	Take and pass EPPP Part 1	Submit additional 1500 of SPE	Take and Pass the EPPP Part 2
Take and Pass EPPP Part 2	Take and pass EPPP Part 2	Take and Pass CPLEE	Submit additional 1500 of SPE
Submit additional 1500 of SPE	Submit additional 1500 of SPE	Meet all licensure requirements and pay licensure fee of \$400	Take and Pass CPLEE
Take and Pass CPLEE	Take and Pass CPLEE		Meet all licensure requirements and pay licensure fee of \$400
Meet all licensure requirements and pay licensure fee of \$400	Meet all licensure requirements and pay licensure fee of \$400		

Chart 2. Current California Examination Qualification for the EPPP

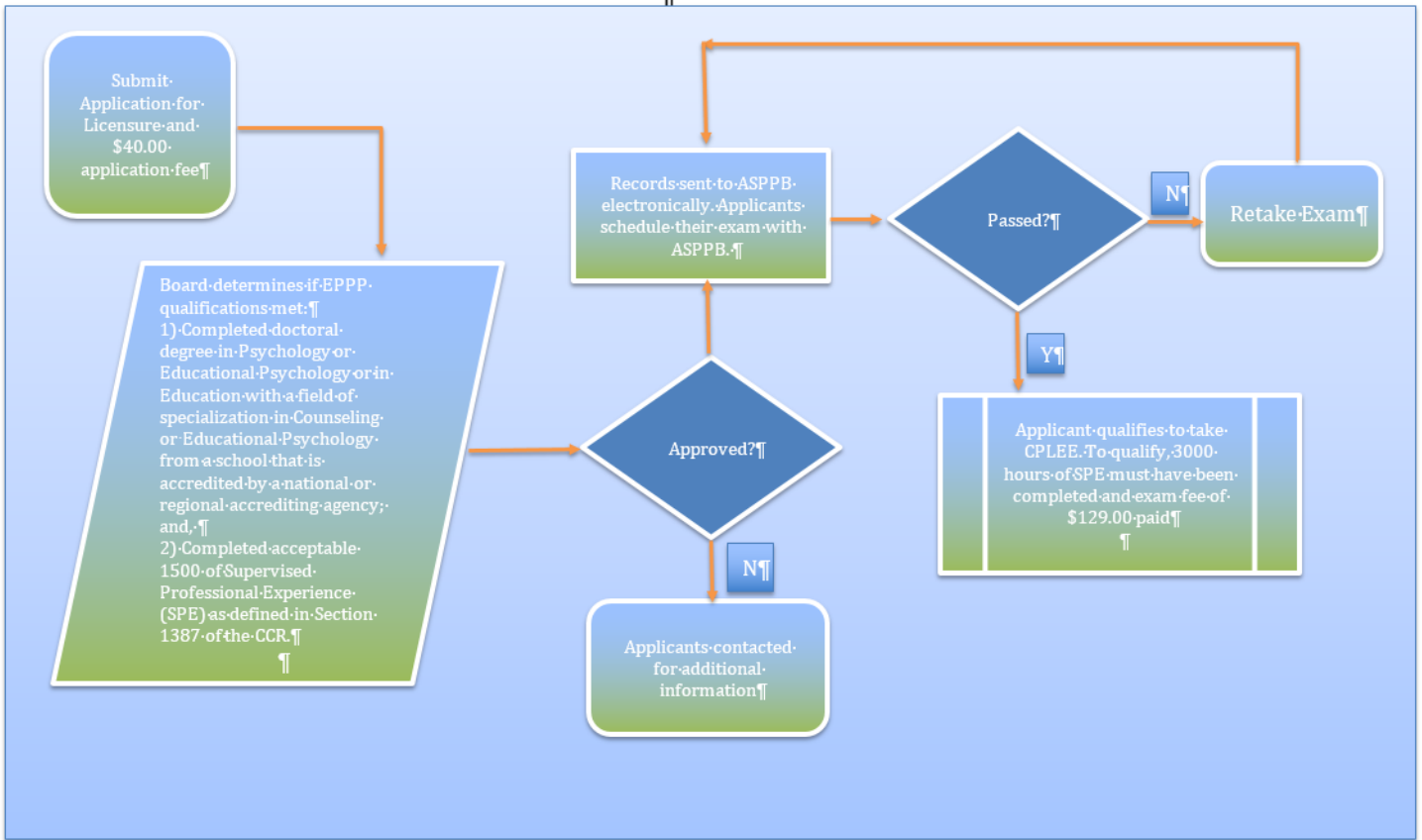


Chart 3. EPPP Examination Process (1/1/2020) Without Changes to Regulations (Option 1)

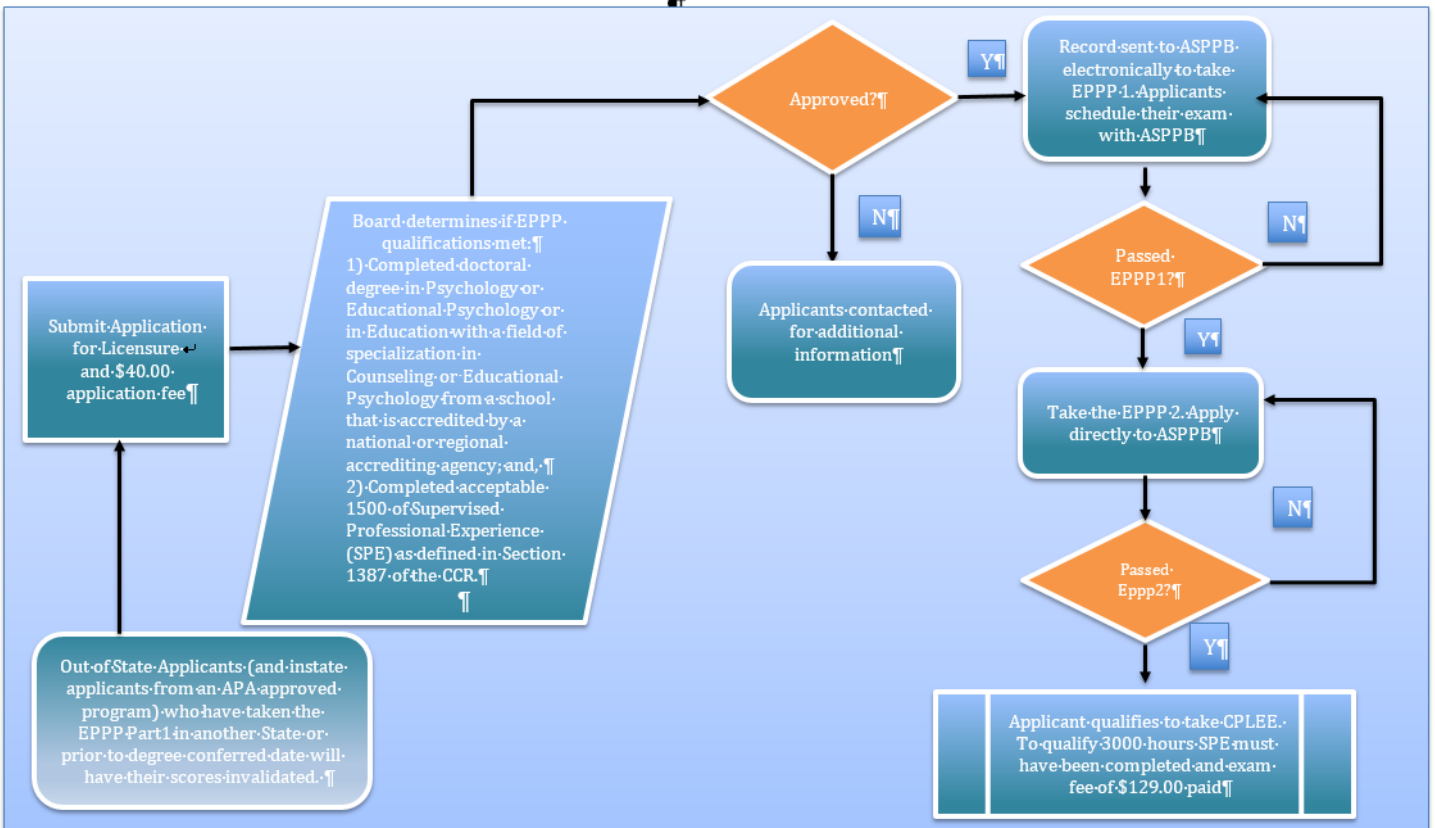


Chart 4. EPPP Examination Process (1/1/2020) With ASPPB Pre-Degree Eligibility (Option 2)

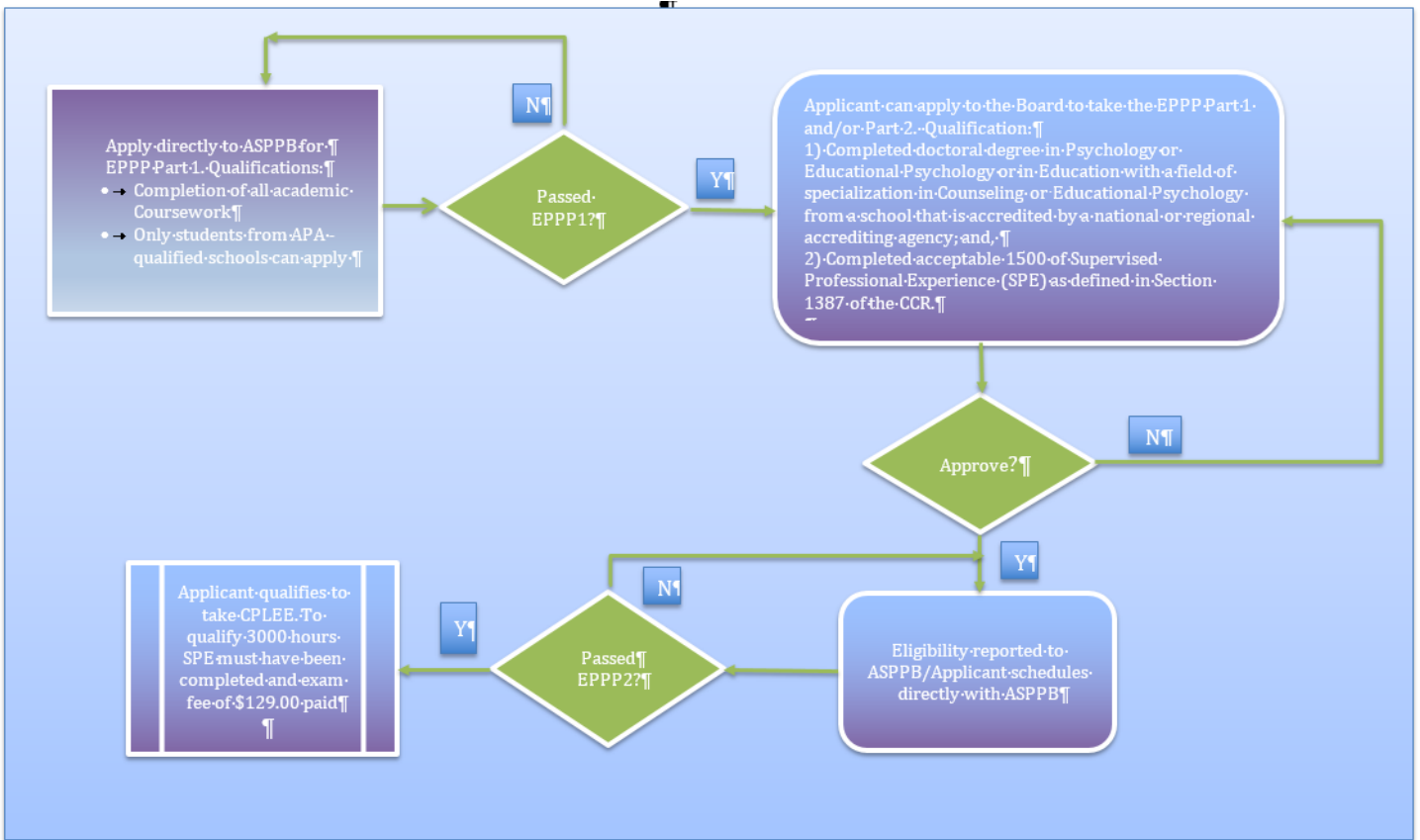
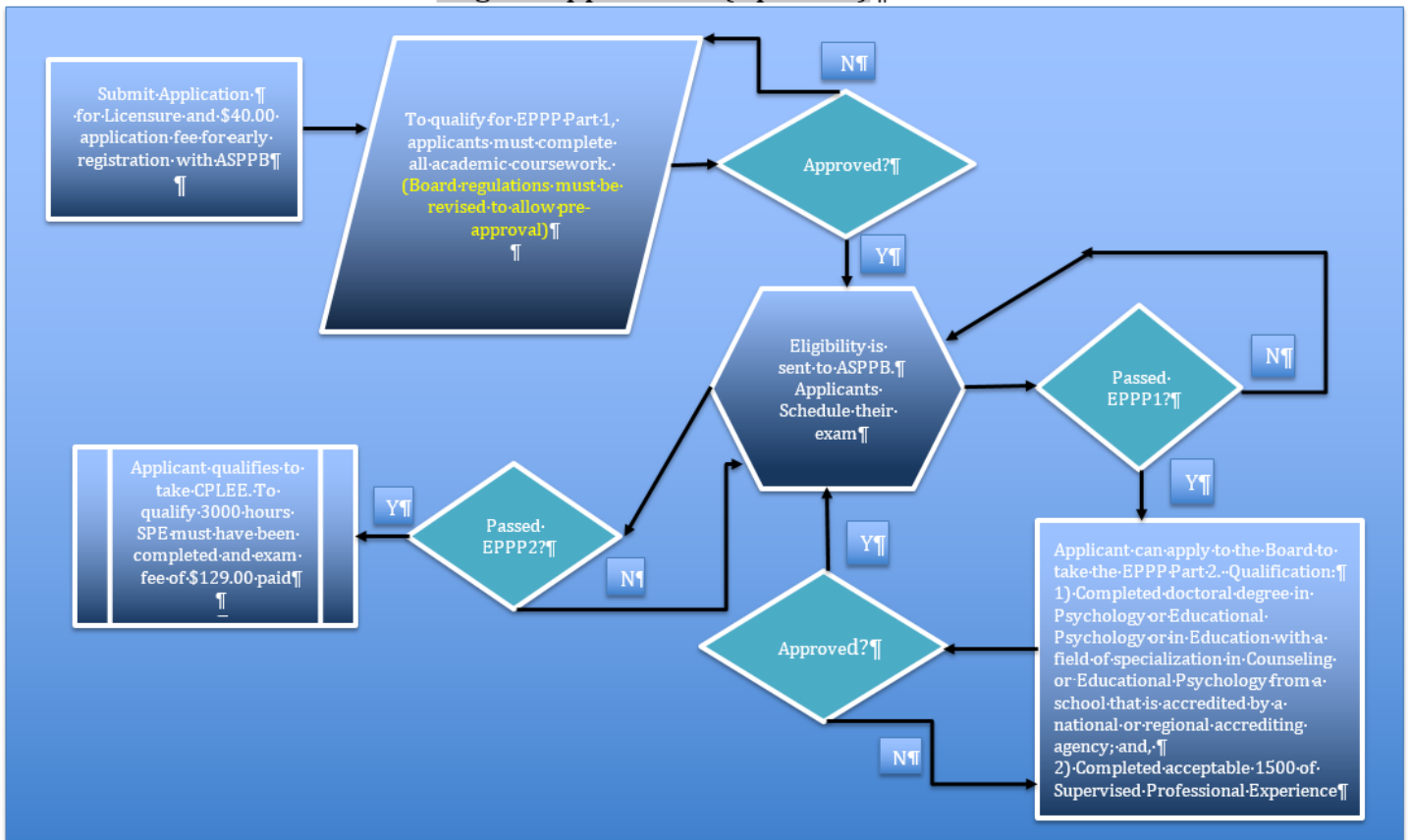


Chart 5. EPPP Examination Process (1/1/2020) With Board Pre-Degree Eligibility (Option 3)



Ensuring Exam Eligibility is Consistent and Equitable

As seen in the Charts above, the options for implementation can have significant impacts on what body approves examination eligibility, the sequencing for examination eligibility, the length of the initial licensure process, and in some instances, giving differential advantages to different pools of prospective licensees in both the sequencing and length of the initial licensure process. At the Task Force meeting, Board staff highlighted the following concerns with the above options:

- Implementation Option 1 (no regulation changes) could result in an inconsistent application process where the examination results for applicants who have taken the EPPP Part 1 in another state could be invalidated if it was taken prior to degree completion, thus unfairly penalizing out of state applicants.
- Implementation Option 2 (pre-degree eligibility for APA students through ASPPB) was the most inconsistent and least equitable option as it creates a deliberate and unfair licensing process and market disadvantage for students who are in non-APA approved programs as it will extend the timeframe for completion of all licensure requirements for non-APA students and delays non-APA student's ability to start practicing professionally and earning professional wages, thus extending the time they will need to be paying for the associated student loans.
- Implementation Option 3 (pre-degree eligibility for all California applicants through the Board) was the most equitable solution for all applicants that also preserves the Board's ability to maintain a consistent licensure process and ensure that all applicants meet the same eligibility requirements without undue delay or denial.

During the Task Force's discussion of what entity should approve eligibility and determine the criteria for eligibility for California applicants, the Task Force members felt strongly that the Board should not cede authority to ASPPB for approval of eligibility and that any changes to eligibility should be equitable to all applicants. For this reason, the Task Force recommended that if the Board chooses to implement EPPP Part 2, that it use Implementation Option 3 to ensure a consistent and equitable process.

There were some concerns about the lack of specificity of the definition of "completion of all academic coursework" which would be used to certify eligibility to take the EPPP Part 1. After considerable discussion regarding whether the definition should be left to each program or be defined as excluding internship and dissertation, the Task Force members agreed that being more specific in the proposed regulations would be preferable in terms of defining what the Board means by the "completion of all academic coursework." Therefore, even if a program has a course and credits associated with internships and the dissertation, the certification by a program training director or school registrar is only certifying to the Board that the student has completed all coursework except those last two classes. Board staff added this definition into the proposed language provided to the Board for consideration.

The Need for More Information and Transparency from ASPPB

If the Board determines that the EPPP2 Task Force needs to continue to meet and to consider additional items, the Task Force members would like the following information to be provided and discussed at a future meeting:

- Due to the way that the discussion of the items went, an official vote on whether the Task Force specifically recommends implementation of the EPPP Part 2 to the Board.
- Due to the verbal nature of the charge provided to members during the first two meetings, provide a written charge and scope of authority for the Task Force.
- The following information was also requested to be obtained from ASPPB:
 - More information from ASPPB on the items included in the test and how it will test for competency.
 - Asks ASPPB to provide information on how this exam will help protect CA consumers
 - Have ASPPB detail their decisions and alternatives they considered in developing EPPP2 and their current timelines for implementation of those considerations,
 - Provide more information on their timeline for rollout of the examination, including a true implementation plan with details, validating the test, and when materials will be available.
 - Provide clarification on the lack of PCSAS inclusion for early eligibility approval.
 - Provide clarification on when the beta testing will be happening and when would we get results on that beta testing.
 - Provide more information on their cost consideration decisions.

Summary of Task Force Recommendations

The Task Force does not believe the EPPP Part 2 is in the best interest of California consumers for the following reasons:

- Lack of a proven necessity for the additional examination;
- Considerable concerns related to the examination designs ability to assess skills and thus potentially providing negligible consumer protections;
- The additional examination's additional costs and burden on prospective licensees, and especially on historically underrepresented and socioeconomically disadvantaged students; and
- The additional examination's creation of new barriers to licensure and potentially detrimental impact on access to psychological services to California consumers.

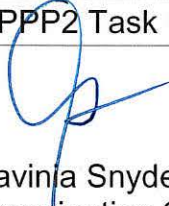
However, if ASPPB continues to make the implementation of the EPPP Part 2 mandatory and not optional, the Task Force had significant concerns with the loss of license portability if the Board does not implement the EPPP Part 2. Therefore, the Task Force recommends that the Board does not discontinue participation in EPPP altogether.

Last, if the Board decides to continue with EPPP (which will be both Part 1 and 2 effective 1/1/2020), then the Task Force recommends implementation Option 3, which would allow early Board eligibility approval of all applicants after completion of their academic coursework, as this option provides the most equitable and consistent process and the least delay in licensure for all prospective licensees.

**Examination for Professional Practice
in Psychology Part 2 (EPPP2)
Task Force Report**

Appendix A

MEMORANDUM

DATE	April 5, 2018
TO	EPPP2 Task Force
FROM	 Lavinia Snyder Examination Coordinator
SUBJECT	Agenda Item #4: Review and Discussion of the Development and Implementation of ASPPB's Enhanced EPPP (Presented by Dr. Emil Rodolfa, Chair of the ASPPB EPPP2 Implementation Task Force and Dr. Matthew Turner, ASPPB Director of Examination Program)

Below are brief bios of Dr. Turner and Dr. Rodolfa. Copies of their presentation is attached.

Dr. Matt Turner is the Director of Examination Services at the Association of State and Provincial Psychology Boards (ASPPB). Dr. Turner oversees the operations and the development of the Examination for Professional Practices in Psychology (EPPP) Part 1 and Part 2 and the Psychopharmacology Exam for Psychologists (PEP). He is a graduate of the University of Kentucky and has 12 years' experience as a school psychologist. Most recently, he served as a lead psychologist and then a part-time psychologist with the Gwinnett County (GA) Public Schools. He has also operated a private practice in child psychology since 2010.

Emil Rodolfa, Ph.D. is a Distinguished Professor of Psychology at Alliant International University's California School of Professional Psychology in Sacramento. He is the Chair of the Association of State and Provincial Psychology Boards' Examination for Professional Practice in Psychology Part 2 Implementation Task Force. He is a Past-President of the State of California Board of Psychology, a Fellow of ASPPB and APA, and the founding editor of *Training and Education in Professional Psychology*. He has been active in many professional associations and has numerous publications exploring education, training, and competency. He has received numerous professional acknowledgments for his contributions to psychology education and training. In his spare time Dr. Rodolfa enjoys spending time with his family, playing horseshoes, and BBQing (some might call it grilling) at his cabin in the mountains.

Attachment: "The Enhanced EPPP: What Got Us Here and Where Are We Headed"
Presentation Slides

The Enhanced EPPP

What Got Us Here and Where Are We Headed?

Emil Rodolfa, PhD, Chair, Implementation Task Force
Matt Turner, Ph.D., Director of Examination Services



What is the Enhanced EPPP?

- One Exam: Two Parts
 - Part 1 (EPPP) = tests knowledge
 - Part 2 = tests skills
Needed for independent practice
- Most significant change in psychology licensing since EPPP launched in 1963.
- Enhanced EPPP (Part 1 and 2) will provide a thorough assessment package of competency to be used by all jurisdictions when Part 2 is available.
- A standardized, objective assessment of professional skills complements the assessment of professional knowledge.



Why the EPPP Part 2?

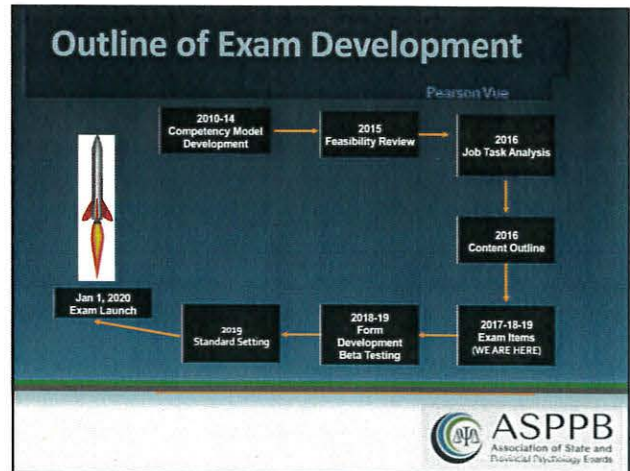
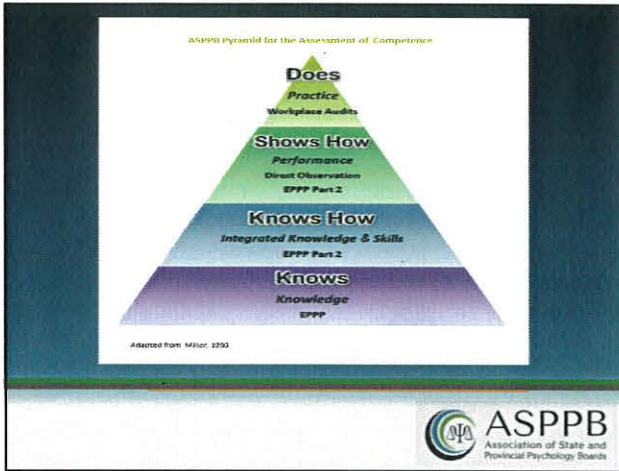
- Licensing boards charged with public protection
- Public protection includes ensuring competence to practice
- Knowledge is one part of competence
- Skills, attitudes, and values comprise the rest of competence
- Psychology and most regulated professions have embraced the move to assessment of competence
- Doctoral healthcare professions have implemented the assessment of competence in licensure examination procedures



Why the EPPP Part 2?

- ASPPB members - supportive
- Lack of standardization in
 - A) Graduate education: 13% to 100% EPPP Pass rates
 - B) Practicum training: AAPI hours
- Accreditation is for **programs**, licensing boards approve **individuals**
- Supervisors' difficulty writing critical or constructive letters of evaluation
- Technology now available to assess competency
- In the eyes of others, equalizes Psychology with other healthcare professions
- Greater understanding of how to assess competency





EPPP Part Job Task Analysis Results

- 2736 licensed psychologists responded from 61 of 64 jurisdictions (95%)
- 84% from the US; 16% from Canada

The Blueprint for the EPPP Part 2: Competency Domains and Weights

• Scientific Orientation	6%
• Assessment and Intervention	33%
• Relational Competence	16%
• Professionalism	11%
• Ethical Practice	17%
• Collaboration, Consultation, Supervision	17%

**THIS BLUEPRINT IS THE FOUNDATION FOR THIS MEETING

ASPPB
Association of State and Provincial Psychology Boards

QUESTIONS About the EPPP Part 2

- Many questions are answered on the ASPPB Website:
- www.asppb.net/page/EPPPPart2

ASPPB
Association of State and Provincial Psychology Boards

**ASPPB is well on the way to
developing a standardized,
reliable, valid assessment of the
skills needed for independent
practice:
The EPPP Part 2**



Contact Us:

Please email me if I can provide you additional information:
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Or please feel free to email Carol Webb: cwebb@asppb.org

More Information: www.asppb.net/page/EPPPPart2



**Examination for Professional Practice
in Psychology Part 2 (EPPP2)
Task Force Report**

Appendix B

The EPPP Part 2

The Assessment of Skills needed for the Independent Practice of Psychology

October 2017

The EPPP Part 2: The Assessment of Skills needed for the Independent Practice of Psychology

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An Overview of the Rationale for the EPPP Part 2

Assessing competence to practice independently is a critical function of psychology licensing boards and colleges throughout the United States and Canada. Competence is the integrated and habitual use of knowledge, skills, attitudes, and values in psychology. The evaluation and establishment of competence is necessary to ensure the protection of the public.

Establishing competence is the key to ensuring that a professional is capable of practicing as part of the profession safely and effectively (Rodolfa et al., 2005).

A current component of the profession's assessment of readiness for independent practice is a test of knowledge, the Examination for Professional Practice in Psychology (EPPP). The EPPP has served the profession well for over 50 years, but as the profession has moved toward embracing a culture of competence it has become clear that a standardized method to assess the skills needed to practice independently is also required. Other professions that embrace a culture of competence utilize knowledge-based and skills-based exams to determine readiness to practice independently.

Currently there are a number of educational models used to train students in the field of psychology, many of which are accredited by the American Psychological Association (APA) and the Canadian Psychological Association (CPA). The APA and CPA accreditation systems do not require a prescribed course of education and training. Rather the focus of both accreditation systems is on ensuring that the core competencies for the profession are covered as opposed to prescribing the means by which they are covered. Thus, there is diversity in how students are trained, resulting in sometimes vastly different levels of knowledge and skills in students. ASPPB values these accreditation systems, and in fact has endorsed the position that "... graduation from an APA or CPA accredited program should be a minimum requirement for doctoral level licensure for health service providers".

It should be noted that accreditation systems accredit training programs, *not* individuals. As licensing boards license individuals, it is their duty to assure the public that each individual who is licensed is competent to practice independently.

Evidence of a lack of standardization in training can be seen in the range of EPPP pass rates for APA/CPA-accredited programs, which ranges from 13% to 100% (ASPPB, 2016). Additionally, as can be seen from summary data on the APPIC Application for Psychology Internship, there is great variability in the type and quantity of practicum experiences that are required by accredited programs (APPIC, 2015, 2016). This variability in training models and experiences results in students accruing anywhere from a few hundred hours, to several thousand hours of practicum experience.

Not all academic programs, internships or post-doctoral residencies are APA/CPA accredited; thus, some individuals who become licensed have received training from programs that have not been reviewed by an external agency. Students from these academic programs

consistently underperform on the EPPP when compared to the average student from an accredited doctoral program (Lightfoot, Rodolfa & Webb, 2016). This raises questions about the effectiveness of the training provided by these programs, and suggests the importance of programs being reviewed by an external agency.

Concern regarding the reliability and validity of supervisor written assessments of trainees has been raised for years, and it has been demonstrated that supervisors tend to overestimate their supervisees' competence (e.g., Gonsalvez, 2007; Miller, Rodney, Van Rybrock & Gregory, 1988). This tendency is perhaps the result of the inherent conflict of being in gatekeeper and mentor roles simultaneously. The problem of supervisors overvaluing the competence of their supervisees led APPIC to change its format for intern letters of evaluation to encourage a more accurate evaluation of competence. APPIC requires supervisor letters to address the strengths and weaknesses of their trainees as opposed to a general statement of their performance. The issues of variability in ratings, a lack of standardization in the evaluative process, and the questionable validity of supervisor ratings make it difficult for licensing boards to attest to the competence of the psychologists they license. The EPPP Part 2 will provide an independent, standardized, reliable, and valid assessment of the skills necessary for independent practice.

Critically, the profession of psychology's move towards a "culture of competence" has resulted in essential agreement among key stakeholder groups (e.g., APA's CoA, CPA's AP, ACPRO and ASPPB) regarding the necessary competencies for independent practice. This essential agreement was a necessary precondition to developing a skills examination. Lastly, the technology is now available to assess skills via a computer based examination, rather than the costlier and time-consuming examination using either real or standardized patients. Thus, ASPPB concluded that it is the optimal time to develop a **standardized** examination to assess the functional skills necessary for independent practice.

In January 2016, the Board of Directors (BOD) of the Association of State and Provincial Psychology Boards (ASPPB) approved the development of a skills-based exam. The skills exam will enhance the knowledge-based examination that is currently administered as part of the licensure process. The first part of the new and enhanced EPPP will be the knowledge-based exam, the current EPPP, and the second part will be the skills-based (functional skills) exam, the EPPP Part 2. With a test to assess skills in addition to the current test to assess knowledge, licensing boards will have available to them an *enhanced EPPP* that will offer a standardized, reliable and valid method of assessing competence.

This document provides an overview of the development of the EPPP Part 2.

Developing an Empirical Base for a Competency Model

The historical efforts of the competency movement propelled the profession of psychology forward in its development of a conceptual basis for a competencies framework. ASPPB's initial attempt to use empirical evidence to inform the development of a competency model occurred in 2009 with the work of the ASPPB Practice Analysis Task Force (PATF). In addition to the task of revalidating the knowledge domains of the EPPP, the PATF was charged with: 1) identifying and validating underlying professional competencies in psychology, and 2) identifying assessment methods that would best measure these competencies. The goal of the EPPP practice analysis is to ensure that the exam reflects the knowledge necessary for competent practice, and in doing so the public interest is protected.

A competency model was proposed by the PATF based on the data obtained from the practice analysis. The PATF then developed a survey regarding the practice competencies identified in the model, and randomly sampled 4732 licensed psychologists from across Canada and the United States. Psychologists were asked to rate and comment on the relevance to the practice of psychology, of 37 competency statements and 276 behavioral exemplars in the following clusters:

- Scientific Knowledge
- Foundational competencies
 - Evidence-based decision making/critical reasoning cluster
 - Interpersonal and cultural competence cluster
 - Professionalism/ethics cluster
- Functional competencies
 - Assessment cluster
 - Intervention/supervision/consultation cluster

Survey respondents were asked to indicate the frequency with which they performed each competency in their practice during the previous year, the degree to which each competency was critical for optimizing outcomes for clients, and the importance of each competency to their psychology practice during the previous year. Respondents were also asked to comment on the point in their development at which a psychologist should be able to demonstrate each behavioral exemplar.

The ASPPB Competency Model and results of the survey were described in the Practice Analysis Report (ASPPB, 2010) and in an article written by members of the PATF (Rodolfa et al., 2013). The full report of the Practice Analysis is available on the ASPPB web site.

In 2010, the ASPPB Board of Directors appointed a task force to investigate the possibility of developing a method to assess functional skills. The Competency Assessment Task Force (CATF) used the PATF competency model as the basis of its continued development of an ASPPB Competency Model for Licensure. It reviewed the competency model, carefully exploring the data generated in the PAFT survey and comparing the model with other competency models, including the competency model utilized in Canada that is part of the Mutual Recognition Agreement (MRA).

The CATF developed criteria to focus the model to include only those competencies and behavioral exemplars that are the most relevant and needed at the point of initial licensure. The criteria chosen were based on empirical results from the PATF study. The CATF then conducted an in-depth examination of each competency and its related behavioral exemplars, eliminating redundancies and rewording for clarity when necessary. This process resulted in a model with 6 competency clusters, 32 competencies and 97 behavioral exemplars.

Once this was completed, the CATF sought the opinions stakeholders, conducting two surveys of the revised model of competency:

CATF Regulator Survey: The CATF surveyed the ASPPB membership to determine regulators' opinions regarding whether entry-level licensees/registrants should be able to demonstrate the 97 behaviors that defined in the model, and whether these behaviors are critical to public protection.

CATF Training Director Survey: The CATF subsequently surveyed the Association of Psychology Postdoctoral and Internship Centers (APPIC) membership (internship and postdoctoral residency training directors) and APPIC subscribers (academic program directors) regarding the competency model. Helpful ratings were received about which behavioral exemplars they felt trainees were expected to demonstrate at three different developmental levels (end of internship, end of postdoctoral residency, and post-licensure).

Results of the Surveys and 2014 Competency Model

Seventy regulators from 42 jurisdictions in the United States (81%) and 6 jurisdictions in Canadian (60%) provided empirical support for the majority of the model. The data from the training director survey (N=216) substantially mirrored the results of the regulator survey, and also provided empirical support for the model. As a result of the survey feedback, the CATF made further modifications to the proposed ASPPB Competency Model and eliminated the Supervision competency. The model, *ASPPB Competencies Expected at the Point of Licensure*, was approved by the ASPPB BOD in 2014.

2016 Job Task Analysis

Another job task analysis (also known as a practice analysis) was initiated in 2016 to revalidate the knowledge base for the EPPP Part 1 and to validate the current form of the competencies model to be used to provide the blueprint for the new exam, the EPPP Part 2. The Job Task Analysis Advisory Committee with the assistance of the exam vendor (Pearson Vue) analyzed the results of survey responses received from 2736 licensed psychologists from across Canada and the USA. The responses were used to formulate the *2017 version of the ASPPB Competencies Expected at the Point of Licensure*. The respondents, all of whom were practicing psychologists rated the competencies in the model according to whether or not they are needed at the point of licensure, as well as on the criticality and utility of each. The results validate the original competency model, with the addition of a Supervision competency. Changes were made to the structure of the original competency domains based on the data received and the feedback of the expert panel advising the job task analysis. Thus, there are different names for some of the domains in this latest iteration of the model (e.g., Professional Practice is focused on two major areas of practice - Assessment and Intervention; Systems Thinking has been broadened to include Collaboration, Consultation and Supervision). While most of the language of the competencies and behavioral exemplars was retained, some of the actual competencies and behavioral exemplars were refined, moved, clarified and updated, or deleted based on the data received. The comments below provide an overview, and Appendix A contains the updated ASPPB competency model which was empirically based on the input from these various sources. This model was approved by the ASPPB BOD in February, 2017. A full report of the 2016 Job Task Analysis is available on the ASPPB website.

2017 ASPPB Competencies Expected of Psychologists

at the Point of Licensure

The 2017 version of the competency model contains the following competency domains:

1. **Scientific orientation:** This competency domain involves an orientation to the knowledge developed through the science of psychology, including evidence-based practice, as well as a scientific method of looking at and responding to psychological problems. This general competency also involves the knowledge of the core areas of psychology, which will not be assessed by the new competency part of the EPPP as they are currently well assessed by the Part 1 of the Examination for Professional Practice in Psychology.
2. **Assessment and Intervention:** This competency domain involves the provision of psychological assessment and intervention services to the public.
3. **Relational competence:** This competency domain includes the ability to engage in meaningful and helpful professional relationships, as well as to understand and interact appropriately in a variety of diverse cultural and social contexts. It includes the two sub-categories of diversity and relationships.
4. **Professionalism:** This competency domain includes personal competence, the ability to identify and observe the boundaries of competence and reflective practice, the ability to be self-reflective and to receive feedback from others in relationship to one's psychological activities.
5. **Ethical practice:** This competency domain involves the ability to apply both the ethical codes of the profession and the laws and regulations that govern the practice of psychology.
6. **Collaboration, Consultation, and Supervision:** This competency domain involves the ability to understand and work with individuals within broader systems and includes the skills to operate effectively and ethically within organizational structures, to collaborate with others in a cooperative, multidisciplinary manner and to effectively and ethically provide supervision to students, trainees and other professionals.

Appendix A contains a complete list of competencies and the behavioral exemplars that were identified within each competency cluster.

Comparison of Competency Models

A comparison of the competency clusters articulated in the current ASPPB Competency Model (2017), the competencies articulated in the Canadian Mutual Recognition Agreement (MRA, 2004), and the competency model contained in the APA Commission on Accreditation's (CoA) *Standards of Accreditation* (2015) is presented in Appendix B. In comparing these three models, it is clear that there is substantial overlap at the domain or cluster level of the models, as well as at the competency level. The comparison suggests that there is agreement among educators, practitioners, and regulators regarding the competencies required for the independent practice of psychology.

Assessment of Competence

Miller's Pyramid (1990) is an assessment framework that was designed for use in the assessment of practitioner clinical skills, and was developed for use by the profession of medicine. This framework was adapted by the CATF to describe the developmental process that psychologists go through as they establish the competence necessary for independent practice. The CATF's adaptation of the Pyramid provides a simple representation of the manner in which the practice competencies develop, and provides a useful rubric for their assessment. As displayed in Figure 1, the first and foundational stage in the pyramid is "KNOWS", the second is "KNOWS HOW", the third is "SHOWS HOW", and the fourth and final level is "DOES".

The EPPP Part 1 is a test of core knowledge in the profession, and in essence forms the base of the pyramid – "KNOWS." In this stage of competency development, the candidate knows information (e.g., the tenets that are part of a well-known theory of personality development), and can demonstrate this knowledge on the test. The next stage of competency development reveals that the candidate "KNOWS HOW" to do something (e.g., can state the basic procedure for administering common intelligence tests and "apply" such information to an assessment situation). The EPPP Part 2 will be able to assess many of the competencies related to the "KNOWS HOW" stage of competency development and a number of the competencies in the third stage, "SHOWS HOW", (e.g., correctly using a standard score table). Other competencies in the "SHOWS HOW" stage will need to be assessed through direct observation, either with an Objective Structured Clinical Examination (OSCE) or similar type of assessment tool, or by enhanced supervisor assessments.

It is important to stress that no single method can measure all of the competencies needed to practice psychology. Thus, the CATF discussed a number of other methods to assess a candidate's skills at each of the levels of the Pyramid. The CATF encouraged the development of enhanced competency-based supervisory evaluation forms and processes to be included in the information provided to psychology licensing boards/colleges that demonstrates the candidate's competency in terms of the "SHOWS HOW" stage.

The “DOES” stage reflects the actual practice of psychology that may be assessed in an ongoing way through practice or workplace audits. Epstein and Hundert’s (2002) often quoted definition of competency sums up ‘DOES” as the “habitual and judicious use of communication, knowledge, technical skills, clinical reasoning, emotions, values, and reflection in daily practice for the benefit of the individual and community being served (p. 226). ... Competence depends on habits of mind including attentiveness, critical curiosity, self-awareness, and presence (p.228).” In the world of psychology licensing, however, assessment of the “DOES” stage remains a future endeavor.

The CATF’s adapted version of Miller’s Pyramid for assessing competency for licensure in psychology is shown below.

ASPPB Pyramid for the Assessment of Competence



Adapted from Miller, 1990

Reviewing Methodologies to Assess Competency

Based on a review of the literature and consideration of testing methods in other professions, the two general methodologies that appeared to be the most appropriate for a skills examination were computer-based testing and in-person testing. The CATF reviewed each of the ASPPB competencies to determine how a skill might best be tested and determined that the majority of competencies could be sufficiently assessed by a computer-based, written examination. When the ASPPB Competency Model changed as a result of the 2016 Job Task Analysis, the members of the EPPP Part-2 Implementation Task Force and the ASPPB Job Task Analysis Advisory Committee reviewed each of the competencies of the revised model. Based on this review, it was again determined that the majority of the competencies could be sufficiently assessed through computer-based testing.

Computer-Based Testing Procedures

There is extensive information available in the literature about the use of innovative item types that can be administered to candidates via computer to assess competence (Parshall & Harmes, 2007, Parshall & Harmes, 2008). These innovative item types can be used to pose the “KNOWS HOW” questions and basic “SHOWS HOW” items as identified within the proposed assessment framework.

The current EPPP (now known as the EPPP Part 1) uses a multiple-choice examination format, but there are many other item type options for computer-based examinations. Such innovative item types include expanding the multiple-choice format to include a larger number of distractors or multiple correct responses, including sequencing questions (e.g., the best next steps to be taken in a series of actions). Other possibilities include fill-in-the-blank, short answer completion, or questions requiring the candidate to circle or highlight the most important information presented in a table, figure, or paragraph. Graphics and images (audio or video) and stimuli including short video vignettes with multiple serial questions can also be used. Although most commonly used as a summative evaluation of examinee’s mastery of the knowledge base (as the current EPPP does), carefully developed examinations can also evaluate a number of foundational and functional competencies.

Review of Competency Assessment Procedures Used by Other Professions

A review of how other human service professions evaluate the competency of applicants for licensure revealed that typically skills examinations are utilized. Most other professions require both a test of knowledge and a test of skills in their assessment of candidate competence to practice independently. The number of examinations utilized in assessing competence varies between professions, and can be two or three separate examinations.

The first examination is most commonly a test of what the candidate “KNOWS”; the second is a “KNOWS HOW” skills test; and when there is a third examination, it is a “SHOWS HOW” examination that requires the application of “KNOWS HOW” skills when interacting with another human being, typically a standardized patient. The intent is that the EPPP Part 2 will allow for assessment at both the “KNOWS HOW” and the “SHOWS HOW” stages of competency development.

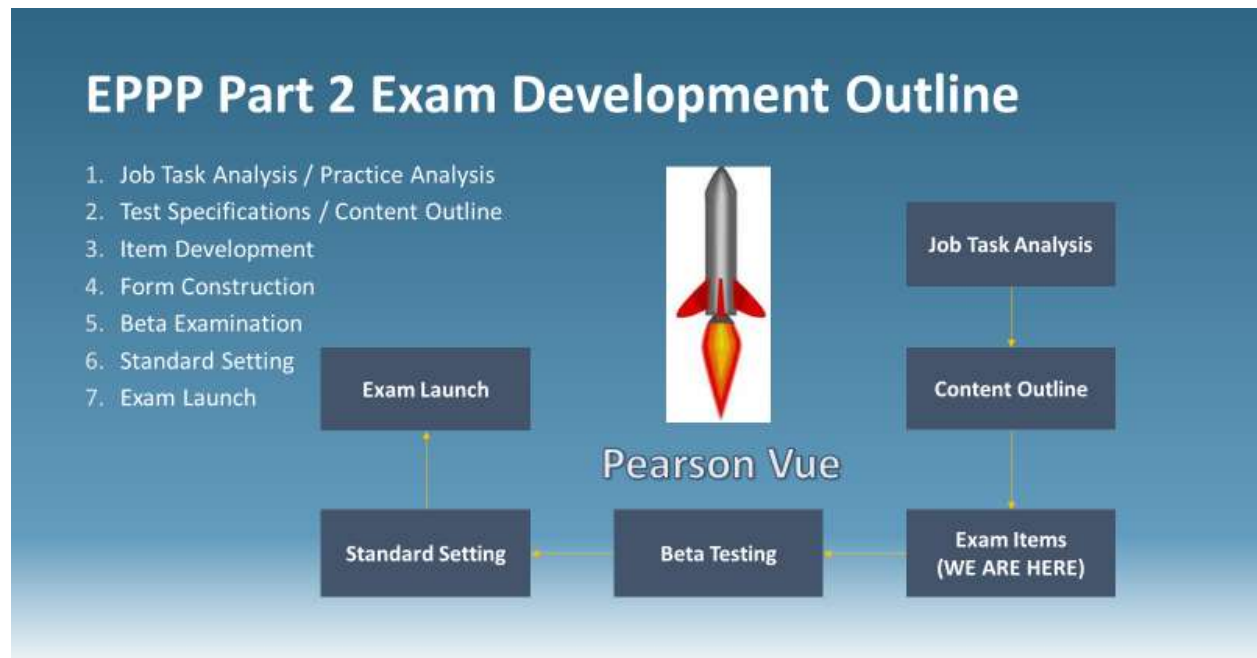
Other professions’ competency examinations are consistently based on their competency models. These competency models used to assess practice readiness typically include assessment, intervention, ethics, professional behavior and interpersonal behavior, and interprofessional consultations.

There were many different models for item development described by the professions. The CATF found that the most relevant model with the most utility for the development of a Knows How/Shows How Examination is used by the Medical Council of Canada. Their documents can be obtained at http://meds.queensu.ca/assets/CDM_Guidelines_e.pdf.

The Timeline for Skills Assessment in Psychology

As one might imagine, there are many tasks involved with the development of a skills examination. The time line below outlines the exam development tasks accomplished to this point, what remains to be done, and when it will be done. From 2010-2014, ASPPB developed a competency model with significant input from psychology member boards. In 2015 ASPPB determined that developing the EPPP Part 2 was feasible, both conceptually and financially. In 2016, the competency model was tested and validated through the 2016 job task analysis project that resulted in the blueprint that will form the basis for the structure of the EPPP Part 2. Over the next several years ASPPB will be training licensed psychologists to write items for the new exam. Both traditional item types like multiple choice questions, and innovative item types such as the use of avatars to demonstrate a targeted skill, presentation of a section of a test manual or a test protocol to use in answering questions, written vignettes with cascading questions, or questions that require ordering of information will be utilized in the new exam. During the coming years, ASPPB will develop a robust item bank, will create exam policies and procedures, and will develop multiple exam forms. ASPPB will then conduct beta testing for the new exam, and use the results of that testing to help create the final forms of the EPPP Part 2. The target date for launching the exam is January 2020.

EPPP Part 2 Exam Development Outline



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APPENDIX A: 2017 ASPPB Competencies Expected of Psychologists at the Point of Licensure

For ease of reading and understanding the model, the competencies are identified by the letter “C” and a number and the behavioral exemplars are identified by the letter “B” and a number.

Domain 1: Scientific Orientation

- C1. Select relevant research literature and critically review its assumptions, conceptualization, methodology, interpretation, and generalizability
 - B1. Critically evaluate and apply research findings to practice, with attention to its applicability and generalizability
 - B2. Interpret and communicate empirical research results in a manner that is easily understood by non-scientific audiences
- C2. Acquire and disseminate knowledge in accord with scientific and ethical principles
 - B3. Critically evaluate the literature relevant to professional practice
 - B4. Share psychological knowledge with diverse groups (e.g., students, colleagues, clients, other professionals, the public) within professional settings in an unbiased manner

Domain 2: Assessment and Intervention

- C3. Apply knowledge of individual and diversity characteristics in assessment and diagnosis
 - B5. Integrate knowledge of client characteristics in formulating assessment questions and understanding the reason for assessment
 - B6. Select assessment methods and instruments based on psychometric properties, available normed data and/or criterion-referenced standards, and address any limitations in that selection
- B7. Ensure that professional opinions, recommendations, and case formulations adequately reflect consideration of client characteristics
- C4. Demonstrate effective interviewing skills
 - B8. Adapt interview questions and behaviors in light of the characteristics of the interviewer and interviewee

- B9. Demonstrate flexible, empathic, and appropriate use of a broad range of interview techniques
- B10. Consider contextual information (e.g., reason for assessment, possible legal or forensic considerations) in conducting an interview
- C5. Administer and score instruments following current guidelines and research
 - B11. Administer, score, and interpret a range of commonly used standardized assessment instruments
 - B12. Adapt relevant guidelines in situations requiring non-standard administration, scoring, interpretation, or communication of assessment results
- C6. Interpret and synthesize results from multiple sources (e.g., multiple methods of assessment, written documentation, interviewees, collateral sources of information) following current guidelines and research
 - B13. Interpret and integrate results from standardized tests and interviews following established guidelines and, as appropriate, multiple applicable norm sets
 - B14. Identify the strengths and limitations of various types of assessment data
 - B15. Reconcile or explain discrepancies between various sources of data and suggest alternative interpretations or explanations in light of any limitations of assessment instruments
 - B16. Synthesize client-specific and scientific data with contextual factors to refine working hypotheses and develop conclusions and recommendations across a range of problems
- C7. Formulate and communicate diagnoses, recommendations, and/or professional opinions using relevant criteria and considering all assessment data
 - B17. Formulate diagnoses using current taxonomies
 - B18. Provide recommendations that incorporate client and contextual factors, including diagnoses
 - B19. Communicate assessment results to clients, referral sources, and other professionals in an integrative manner
- C8. Select interventions for clients based on ongoing assessment and research evidence as well as contextual and diversity factors
 - B20. Conceptualize intervention or treatment on the basis of evidenced-based literature

- B21. Integrate client or stakeholder opinions, preferences, readiness for change, and potential for improvement into intervention plan
- C9. Apply and modify interventions based on ongoing assessment, research, contextual factors, client characteristics, and situational and environmental variables
 - B22. Articulate evidence-based rationale for decisions, recommendations, and opinions to clients and others as indicated
 - B23. Continually evaluate, modify, and assess the effectiveness of interventions, considering all relevant variables including biases and heuristics
 - B24. Consult with qualified peers when facing the need to modify interventions in unfamiliar situations

Domain 3: Relational Competence

- C10. Integrate and apply theory, research, professional guidelines, and personal understanding about social contexts to work effectively with diverse clients
 - B25. Recognize, understand, and monitor the impact of one's own identities in professional situations
 - B26. Engage in respectful interactions with an awareness of individual, community, and organizational differences
 - B27. Modify one's own behavior based on self-reflection and an understanding of the impact of social, cultural, and organizational contexts
 - B28. Follow professional guidelines and the scientific literature, when available, for providing professional services to diverse populations
 - B29. Apply culturally appropriate skills, techniques, and behaviors with an appreciation of individual differences
- C11. Work effectively with individuals, families, groups, communities, and/or organizations
 - B30. Use relational skills to engage, establish, and maintain working relationships with arrange of clients
 - B31. Communicate respectfully, showing empathy for others
 - B32. Collaborate effectively in professional interactions
- C12. Demonstrate respect for others in all areas of professional practice

- B33. Consider differing viewpoints held by clients and others
- B34. Respond to differing viewpoints by seeking clarification to increase understanding before taking action
- C13. Identify and manage interpersonal conflict between self and others
 - B35. Manage difficult and complex interpersonal relationships between self and other
 - B36. Consult with peers to examine and address one's own reactions and behavior when managing interpersonal conflict

Domain 4: Professionalism

- C14. Identify and observe boundaries of competence in all areas of professional practice
 - B37. Identify limits of professional competence
 - B38. Use knowledge of professional competence to guide scope of practice
 - B39. Seek appropriate consultation when unsure about one's competence and additional needs for training and professional development
 - B40. Seek additional knowledge, training, and supervision when expanding scope of practice
 - B41. Update knowledge and skills relevant to psychological practice on an ongoing basis
- C15. Critically evaluate one's own professional practice through self-reflection and feedback from others
 - B42. Engage in systematic and ongoing self-assessment and skill development
 - B43. Accept responsibility for one's own professional work and take appropriate corrective action if needed
 - B44. Maintain awareness of personal factors that may impact professional functioning

Domain 5: Ethical Practice

- C16. Demonstrate and promote values and behaviors commensurate with standards of practice, including ethics codes, laws, and regulations
 - B45. Demonstrate integration and application of ethics codes and laws in all professional interactions

- B46. Communicate ethical and legal standards in professional interactions as necessary
- B47. Seek professional consultation on ethical or legal issues when needed
- B48. Discuss with peers or collaborators any ethical concerns with their behavior
- B49. Take appropriate Parts to resolve conflicts between laws or rules and codes of ethics in one's professional practice
- C17. Accurately represent and document work performed in professional practice and scholarship
 - B50. Maintain complete and accurate records
 - B51. Report research results accurately, avoiding personal biases
 - B52. Ensure adequate and appropriate credit is given to trainees and collaborators in scholarship
- C18. Implement ethical practice management
 - B53. Practice in a manner commensurate with laws, ethical standards, practice guidelines, and organizational constraints
 - B54. Manage billing practices in an ethical manner
- C19. Establish and maintain a process that promotes ethical decision-making
 - B55. Systematically identify the ethical and legal issues and conflicts that occur in professional practice
 - B56. Consult with peers to aid in ethical decision-making when needed
 - B57. Proactively address identified ethical issue

Domain 6: Collaboration, Consultation, and Supervision

- C20. Work effectively within organizations and systems
 - B58. Recognize the organizational and systemic factors that affect delivery of psychological services
 - B59. Utilize knowledge of organizations and systems to optimize delivery of psychological services
- C21. Demonstrate interdisciplinary collaborations
 - B60. Collaborate with various professionals to meet client goals
- C22. Consult and collaborate within and across professions

- B61. Tailor consultation requests and provision of information based on knowledge of others' professional needs and viewpoints
- B62. Use evidence-based psychological theories, decision-making strategies, and interventions when consulting
- B63. Continually evaluate, modify, and assess the effectiveness of consultation, considering all relevant variables
- C23. Evaluate service or program effectiveness across a variety of contexts
 - B64. Develop plans for evaluating service or program effectiveness
 - B65. Assess outcome effectiveness in an ongoing way
- C24. Ensure supervisee compliance with policies and procedures of the setting, the profession, and the jurisdiction
 - B66. Provide a supervision plan that details the supervisory relationship and the policies and procedures of supervision, including procedures to manage high-risk situations
 - B67. Identify responsibilities of supervisees towards clients, including informed consent and supervisory status
- C25. Monitor, evaluate, and accurately and sensitively communicate supervisee performance to the supervisee, the organization, and the jurisdiction as needed
 - B68. Regularly provide behaviorally anchored feedback about supervisee strengths and areas that need further development
 - B69. Assure that supervisees who are trainees practice within the scope of supervisor's competence and license
- C26. Create and maintain a supportive environment in which effective supervision occurs for trainees and other professionals being supervised
 - B70. Attend to the interpersonal process between supervisor and supervisee
 - B71. Monitor possible multiple roles or conflicts of interest, and work toward resolution, if needed


2017 Comparison of Competency Models

ASPPB	MRA (Canadian)	CoA (US)
Scientific Orientation <ul style="list-style-type: none"> Core Knowledge Domains 	Research <ul style="list-style-type: none"> Core Content Areas 	Research <ul style="list-style-type: none"> Discipline- Specific Knowledge (DSK)
Assessment and Intervention	Assessment and Evaluation Intervention	Assessment Intervention
Relational Competence	Interpersonal Relationships <ul style="list-style-type: none"> Knowledge of Others 	Individual & Cultural Diversity Communications & Interpersonal Skills
Professionalism	Interpersonal Relationships <ul style="list-style-type: none"> Knowledge of Self 	Professional Values, Attitudes & Behaviors
Ethical Practice	Ethics and Standards	Ethical and Legal Standards
Collaboration, Consultation and Supervision	Supervision Consultation Interpersonal Relationships <ul style="list-style-type: none"> Macro-environment 	Consultation & Interprofessional/Interdisciplinary Skills Supervision

**Examination for Professional Practice
in Psychology Part 2 (EPPP2)
Task Force Report**

Appendix C

MEMORANDUM

DATE	June 29, 2018
TO	EPPP2 Task Force
FROM	 Lavinia Snyder Examination Coordinator
SUBJECT	Agenda Item #5: Review and Discussion of ASPPB's Response to the EPPP2 Task Force Letter Regarding Questions and Concerns Raised at the April 5, 2018, Task Force Meeting

Background:

The Board's first Examination for Professional Practice in Psychology Part 2 (EPPP2) Task Force meeting was held on April 5, 2018. The meeting was conducted by Dr. Sheryl Casuga (Chair) and Mr. Seyron Foo (Board member) to discuss issues related to the potential implementation of the EPPP2 and to assist the Board in promulgating regulations. At the meeting, the following issues were discussed:

- a) Is Implementation of a New National Licensing Examination in the Best Interests of California Consumers of Psychological Services and Prospective Licensees?
- b) Should the Board Allow ASPPB to Determine Eligibility for Taking the National Examination for California Applicants? Should There Be Different Eligibility Criteria?
- c) How Would California Licensing Requirements Be Impacted if ASPPB Allows Candidates to Directly Register for and Take the EPPP (Part 1) Prior to Graduation and Completion of 1,500 Hours of SPE?

After a lengthy discussion on these issues, Task Force members decided to send a letter to the Association for State and Provincial Psychology Boards (ASPPB) Board of Directors to address their questions and concerns. A copy of the letter is attached (Attachment A). ASPPB's response to the letter is also attached (Attachment B).

Action Requested:

Discuss ASPPB's response to the Task Force's questions. This item is for informational purposes only, no further action is required.

Attachment A: EPPP2 Task Force Letter to ASPPB Board of Directors

Attachment B: ASPPB's EPPP2 Task Force Response

Attachment A
EPPP2 Task Force Letter to ASPPB Board of Directors

April 9, 2018

Association of State and Provincial Psychology Boards (ASPPB)
Board of Directors
P.O. Box 849
Tyrone, GA 30290

Dear Board Members:

The California Board of Psychology established the Examination for Professional Practice in Psychology Part 2 (EPPP2) Task Force (Task Force) at its February 2018 Board meeting to discuss issues and concerns surrounding the implementation of the EPPP2 and to provide feedback and recommendations to the full Board. The Task Force met on April 5, 2018. At this meeting, Matt Turner, PhD, ASPPB's Director of Examination Services, and Emil Roldolfa, PhD, Chair of ASPPB's EPPP2 Implementation Task Force, made a presentation on the EPPP2 and answered questions posed by the Task Force members.

After the meeting, a list of questions/concerns were developed, and the Task Force is respectfully requesting that the ASPPB Board of Directors address the following issues at its next Board of Directors' meeting:

- What were the factors that led to the decision to create two separate examinations instead of one combined examination that assesses both knowledge and skills?

The concern was raised that having two examinations comes with additional cost to prospective licensees.

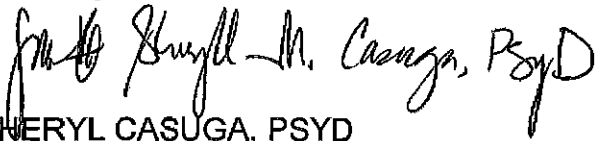
- Would ASPPB consider a mechanism to make the cost of the examination more affordable for low-income applicants or for those serving impoverished communities, underserved populations, or performing services in public agencies? For instance, would there be consideration to lower the cost of the EPPP Part 1 to off-set the cost of the whole examination?
- Would ASPPB reconsider its requirement of American Psychological Association (APA) or Canadian Psychological Association (CPA) accreditation for eligibility to take the EPPP Part 1 for pre-degree graduate students?

The concern was raised that having APA/CPA accreditation as a requirement impedes upon the regulatory function of state boards, given that many states including California do not require APA accreditation. Additionally, some doctoral programs without APA/CPA accreditation, but with regional accreditations, serve as accessible institutions from underrepresented communities, including communities of color, socioeconomically disadvantaged areas, and immigrant communities.

- Would ASPPB consider delaying the implementation of the EPPP2 to allow jurisdictions more time to develop processes, procedures, legislation and/or regulations for implementation?
- What was the formal process ASPPB used to solicit feedback from member boards and would the Task Force be able to review the feedback received?

The Task Force will be conducting another meeting on June 29, 2018 and would be grateful to receive feedback from the Board of Directors in advance for consideration by the Task Force.

Sincerely,

A handwritten signature in black ink that reads "Sheryl M. Casuga, PsyD". The signature is written in a cursive style with a large initial "S" and "C".

SHERYL CASUGA, PSYD
Chairperson, EPPP2 Task Force
California Board of Psychology

Attachment B
ASPPB's EPPP2 Task Force Response



ASPPB

Association of State and
Provincial Psychology Boards

Supporting member jurisdictions in fulfilling their responsibility of public protection.

Dear California EPPP Task Force,

Thank you for the opportunity to discuss the enhanced EPPP. We appreciate your engagement and feedback in this important endeavor. The ASPPB Board of Directors has asked us to respond to your letter. We understand you have questions regarding the development, rationale and implementation of the EPPP. We hope that this letter will be responsive to your concerns.

Specifically, you raised questions about 1) the rationale for two separate examinations; 2) the cost of the EPPP; 3) the early admission requirements; 4) the implementation date of the EPPP Part 2; and 5) the membership feedback regarding the development of the skills examination. Each issue will be addressed below.

What were the factors that led to the decision to create two separate examinations instead of one combined examination that assesses both knowledge and skills?

The concern is that having two examinations comes with additional costs to prospective licensees.

The EPPP continues to be one exam. The exam will be a more comprehensive assessment of competency that is delivered in two parts. The Job Task Analysis drove the decision to lengthen the exam instead of incorporating the knowledge and skills into a single sitting of the examination. The results of the job task analysis revealed that an enormous amount of material will need to be assessed to incorporate a comprehensive assessment of skills. After completion of the Job Task Analysis, the following Blueprint was indicated:

Scientific Orientation to Practice
Relational Competence
Assessment and Intervention
Ethical Practice
Collaboration
Consultation
Supervision
Professionalism

Within this blueprint, 71 skill statements were included. Conversely, 70 Knowledge statements were included in the EPPP part one. Collectively, this will require that 141 statements be thoroughly assessed in order to determine if a candidate meets a minimum, entry level of competence for the profession of psychology. A decision was made to include the addition of the skills assessment as a second part of the examination for several reasons. First, the EPPP as it is constructed now is a 175-item multiple choice examination. It would not be possible to adequately assess the additional skills statements within a reasonable amount of time. The length of the current EPPP is 4 hours and 15 minutes. Increasing this to a single session would lead to a very lengthy examination for the test takers. In addition, any test taker requiring an accommodated administration of extended time would have an extremely lengthy administration. This structure would be too taxing on candidates in general and specifically problematic for those with disabilities.

Second, by offering the exam in two parts, the knowledge portion of the examination could be moved earlier as an option for those that would prefer to take the exam prior to graduation from their academic program. This model is logical, in line with other professions that have competency assessment examinations and will allow candidates more flexibility in taking the exam.

President, Board of Directors – Sharon Lightfoot, PhD

Chief Executive Officer – Stephen T. DeMers, EdD

The proposed increase in examination fees is not related to whether or not the exam is administered in one or two sittings. The increase in fees is related to the significant startup and maintenance costs in the development of a new area of assessment. It is not possible to add this assessment without additional costs.

As ASPPB representatives mentioned in the meeting with the Task Force, the Early Admittance Option will have some benefits, including the following:

- 1. increasing the overall number of candidates that pass the knowledge portion of the examination on their first attempt as our current data indicates that candidates pass at higher rates when the exam is taken closer to completion of academic coursework. This would result in financial savings as fewer individuals would need to retake the exam.*
- 2. decreasing dependence on and associated cost of third party test prep study programs because the knowledge portion of the examination will be taken closer to the foundational coursework and,*
- 3. allowing exam costs to be incorporated into educational loans.*

Would ASPPB consider a mechanism to make the cost of the examination more affordable to low income applicants or those serving impoverished communities, underserved populations, or performing service in public agencies? For instance, would there be consideration of a lower cost for the EPPP Part 1 to offset the cost of the whole examination.

ASPPB is considering options to decrease the hardship associated with increased fees to candidates. No decisions have been made at this time.

Would ASPPB reconsider its requirement of APA or CPA accreditation for eligibility to take the EPPP Part 1 for pre-degree graduate students?

The early entry option will be limited to students that are enrolled in APA or CPA accredited programs. This decision was based on the ASPPB Model Act which recommends that licensure applicants are trained in accredited training programs. In addition, this standard for an early entry option allowed for greatest acceptance by most jurisdictions.

For Jurisdictions that wish to allow an early admittance option for applicants from non-accredited training programs, ASPPB suggests that a rule change be made in those jurisdictions to allow those candidates to be able to take the Part 1 prior to degree. This will enable states and provinces to use criteria relevant in their particular jurisdiction. Jurisdictions would continue to register candidates as they do now but the timing would be prior to degree.

Would ASPPB consider delaying the implementation of the EPPP Part 2 to allow jurisdictions more time to implement processes, procedures, legislation, and or regulations for implementation?

The ASPPB Board of Directors continues to monitor the needs of member jurisdictions and the organization has been actively engaged in communication with jurisdictions about their concerns. In most jurisdictions, there does not appear to be a need to change regulations. At this time, the launch date is planned for January 2020. ASPPB encourages communication from jurisdictions that may be facing hurdles in implementation.

What was the formal process of soliciting feedback from member boards and would the task force be able to review the feedback.

Beginning in 2009 ASPPB has been in discussion with member jurisdictions about assessment of competencies through discussions at membership meetings, review of feedback at such meetings and various surveys of interest. As can be seen from the following data from ASPPB's most recent strategic plan, there was broad support from our member jurisdictions for developing an assessment of skills prior to becoming licensed.

70% of the respondents to the Strategic Plan rated that maintaining ASPPB's Examination Program and expanding it to measure skills was a top priority. This priority ranked as the second highest priority for ASPPB right behind pursuing more consistency in licensing standards to facilitate professional mobility. The skills exam was rated

second, but close to the knowledge exam in order of importance of priority for the next 3-5 years for the examination program.

The Board of Directors remains actively engaged in the process of member feedback and has recently sent out a letter alerting member jurisdictions that they will spend considerable time this summer reviewing all information received. The California EPPP Task Force's letter and any further communications will be included in the board's review.

Thank you for the opportunity to answer your questions. We hope our comments address your concerns. Please feel free to contact us if the Task Force has additional questions or comments.

Matt Turner
ASPPB, Director of Examination Services
mturner@asppb.org

Emil Rodolfa
ASPPB, Implementation Task Force Chair
erodolfa@alliant.edu

**Examination for Professional Practice
in Psychology Part 2 (EPPP2)
Task Force Report**

Appendix D

EPPP2 TASK FORCE MEETING MINUTES

Department of Consumer Affairs
1747 N. Market Blvd., HQ2 Hearing Room #186
Sacramento, CA 95834
(916) 574-7720

1 THURSDAY, APRIL 5, 2018

2

3 **Agenda Item #1: Call to Order/Roll Call/Establishment of a Quorum**

4 Sheryll Casuga, PsyD, Chairperson, called the EPPP 2 Task Force meeting to order at
5 9:36am. A quorum was present and due notice had been sent to all interested parties.

6

7 **Members Present:**

8

9 Sheryll Casuga, PsyD, Chairperson
10 Seyron Foo, Board Member
11 Amy Welch-Gandy, Office of Professional Examination Services (OPES)
12 Crystal Faith Cajilog, Student Representative of California Psychological Association of
13 Graduate Students
14 Anushree Belur, Student Representative of California Psychological Association of
15 Graduate Students for The Chicago School of Professional Psychology
16 William Bloxham, Student Representative of JFK University 5th Year Student
17 Sherry Johnson, Director of Clinical Training, Representative of University of California
18 Rene Puliatti, Esq, Representative of California Psychology Internship Council (CAPIC)
19 Andrew Harlem, PhD, Representative of California Institute of Integral Studies
20 Gilbert Newman, PhD, Representative of The Wright Institute
21 Alejandra Ojeda-Beck, Student Representative of California Psychological Association
22 of Graduate Students, UC Berkeley
23 Sherri Sedler, Student Representative of California Psychological Association of
24 Graduate Students, California Southern University
25 Olga Belik, PhD, Representative of California Psychological Association (CPA), Division
26 II

27

28 **Others Present:**

29

30 Antonette Sorrick, Executive Officer
31 Jeffrey Thomas, Assistant Executive Officer
32 Stephanie Cheung, Licensing Manager
33 Cherise Burns, Central Services Manager
34 Lavinia Snyder, Examination Coordinator
35 Jason Glasspiegel, Central Services Coordinator
36 Norine Marks, Legal Counsel, Department of Consumer Affairs

37

38 **Agenda Item #2: Chairperson Welcome**

39

40 Dr. Casuga welcomed the Task Force members and those in attendance. Ms. Snyder
41 provided an overview of the contents of the packet provided to the attendees of the
42 Task Force meeting.

43
44 **Agenda Item #3: Public Comment(s) for Items not on the Agenda.**

45
46 There were no public comments.

47
48 **Agenda Item #4: Review and Discussion of the Development and Implementation**
49 **of ASPPB's Enhanced EPPP (Presented by Dr. Emil Rodolfa, Chair of the ASPPB**
50 **EPPP2 Implementation Task Force and Dr. Matthew Turner, ASPPB Director of**
51 **Examination Program)**

52
53 Dr. Casuga introduced Dr. Rodolfa and Dr. Turner and advised of the presentation they
54 will be providing for the Task Force.

55
56 Dr. Turner and Dr. Rodolfa began the presentation on behalf of the Association of State
57 and Provincial Psychology Boards (ASPPB).

58
59 Task Force members asked a variety of questions of the presenters during the
60 presentation. Discussion ensued regarding the following topics: ASPPB's perceived
61 deficiency that the EPPP 2 is trying to correct, questions relating to the content validity
62 of the new part of the examination, concerns related to the structure of the examination,
63 increased cost of the examination, the additional time needed for students to pass the
64 new part of the examination before licensure, and implementation timeline for the new
65 part of the examination, and ASPPB's lack of communication with member Board's
66 throughout the development process. Additional concerns were raised about when
67 students would or should be able to take the two parts of the examination and if this
68 would cause delays in licensure and the inequity of allowing students from graduate
69 programs accredited by the American Psychological Association (APA) to take the
70 exam before degree completion versus students from regionally accredited programs.

71
72 Ms. Sorrick assured that the Task Force was aware of the importance of license
73 portability and not creating additional barriers to licensure while discussing this
74 question. Additionally, she provided the Task Force with a spectrum of options
75 regarding answers to the question. She advised that should the Task Force recommend
76 to the Board not to adopt the EPPP 2, which would encompass both the knowledge and
77 competency based examinations, that the Board would need to create their own general
78 knowledge exam. She indicated that doing so may reduce licensure portability, as
79 states other than California will not administer the same examination, and therefore
80 licensees within California would not be expected to meet the criteria for licensure set
81 by other states, thus hindering licensees from California becoming licensed elsewhere.

82
83 **Agenda Item #5: Task Force Discussion of the following issues:**

- 84 a. **Is Implementation of a New National Licensing Examination in the**
85 **Best Interests of California Consumers of Psychological Services**
86 **and Prospective Licensees?**

87

88 Dr. Casuga introduced this question. After which she asked the Task Force members to
89 provide their thoughts on the issue.

90
91 Task Force members provided input on the question and expressed concerns over the
92 following issues: ensuring that the portability of California psychologist license is not
93 diminished, disbelief that the value added of the new part of the examination will
94 outweigh the additional costs and burdens it places on students and that the
95 examination would actually assess skills, the new part of the examination creating
96 additional barriers to entering the profession for socio-economically disadvantaged
97 students, and uncertainty that the new part of the exam will actually ensure competency
98 and enhance public protection.

99
100 Given the aforementioned comments by the Task Force members and Ms. Sorrick, Mr.
101 Foo stated that the new part of the examination will need to be considered for
102 implementation, but that there were significant concerns regarding ASPPB's anticipated
103 2020 start date as well as other items.

104
105 Discussion ensued and a sentiment was reached that introducing a secondary portion
106 to the examination was not in the best interest of California consumers of psychological
107 services and prospective licensees, but that the alternative of the Board abandoning the
108 EPPP and creating its own general knowledge exam was not feasible or desirable due
109 to potential issues with license portability.

110
111 It was M(Harlem)/S (Newman)/C to move to agenda item 5(b)

112
113 Vote: 17 Aye, No-0

114
115 **b. Should the Board Allow ASPPB to Determine Eligibility for Taking**
116 **the National Examination for California Applicants? Should There Be**
117 **Different Eligibility Criteria?**

118
119 Dr Casuga introduced this agenda item. She advised that based on the information
120 provided by ASPPB, ASPPB plans to approve candidates to take the first part of the
121 EPPP prior to the conferring of their degree, as long as they have completed their
122 course requirements, and are attending an APA approved graduate program. Dr.
123 Casuga asked Ms. Snyder to provide the Board's current process regarding providing
124 ASPPB with the list of eligible applicants.

125
126 Ms. Snyder provided the Task Force with the Board's current process of review and
127 approval for eligibility to take the EPPP, including the requirements that the applicant be
128 awarded their degree and have accrued 1500 hours of supervised professional
129 experience.

130
131 After this overview, discussion ensued regarding whether or not the Task Force should
132 recommend the Board accept EPPP scores if Part 1 is taken prior to the confirmation of
133 the degree and accrual of 1500 hours of supervised professional experience, or whether
134 the Board would make the applicant take Part 1 of the EPPP again after approval by the
135 Board.

136
137 After a discussion, the Task Force concluded that it did not approve of ASPPB
138 approving applicants to take Part 1 of the EPPP prior to candidates meeting the Board's
139 specified approval requirements. They also concluded that if ASPPB was going to
140 provide early approvals for students of APA accredited programs, that they believed it
141 would be necessary that the Board approve all applicants for licensure to take part 1 of
142 the exam after completing their coursework but prior to degree conferment and accrual
143 of all 1500 hours.

144
145 Additional discussion ensued regarding the Task Force's role and its ability to make an
146 effective decision regarding the EPPP Part 2 with the information provided. The
147 sentiment of the Task Force was that more information was needed to make an
148 informed decision.

149
150 Dr. Casuga recommended to the Task Force that they ask staff to draft a letter of
151 concern to ASPPB.

152
153 The Task Force agreed with Dr. Casuga and discussed what questions should be asked
154 and agreed on the following questions to be sent to ASPPB:

155
156 What were the factors that led to the decision to create two separate
157 examinations instead of one combined examination that assesses both
158 knowledge and skills?

159
160 Would ASPPB consider a mechanism to make the cost of the examination more
161 affordable for low-income applicants or for those serving impoverished
162 communities, underserved populations, or performing services in public
163 agencies? For instance, would there be consideration to lower the cost of the
164 EPPP Part 1 to off-set the cost of the whole examination?

165
166 Would ASPPB reconsider its requirement of American Psychological Association
167 (APA) or Canadian Psychological Association (CPA) accreditation for eligibility to
168 take the EPPP Part 1 for pre-degree graduate students?

169
170 Would ASPPB consider delaying the implementation of the EPPP2 to allow
171 jurisdictions more time to develop processes, procedures, legislation and/or
172 regulations for implementation?

173
174 What was the formal process ASPPB used to solicit feedback from member
175 boards and would the Task Force be able to review the feedback received?

176
177 The Task Force advised they wanted a response by their next meeting which will allow
178 the responses to be included for discussion.

179
180 Dr. Casuga advised due to time constraints the Task Force will need to table the
181 remaining agenda items for a future meeting.

182
183 **Agenda Item #7:** Recommendations for Agenda Items for Future Task Force Meetings.

184
185 Task Force members requested to see a flow chart to help visualize all of the possible
186 ways that this new examination can be implemented. Additionally, they wanted to see
187 how the Board's regulations might need to be updated.
188

189 **The Task Force adjourned at 5:10pm**

190
191 *John B. Casara, PsyD*
192

7/3/18

193 **Chair**

Date

**Examination for Professional Practice
in Psychology Part 2 (EPPP2)
Task Force Report**

Appendix E

1 **EPPP2 TASK FORCE MEETING MINUTES**

2
3 **Department of Consumer Affairs**
4 **1625 N. Market Blvd., HQ1 Hearing Room #117**
5 **Sacramento, CA 95834**
6 **(916) 574-7720**
7

8 **Friday, June 29, 2018**
9

10 **Agenda Item #1: Call to Order/Roll Call/Establishment of a Quorum**

11 Sheryll Casuga, PsyD, Chairperson, called the EPPP 2 Task Force meeting to order at
12 9:44 a.m. A quorum was present and due notice had been sent to all interested parties.
13

14 **Members Present:**

15
16 Sheryll Casuga, PsyD, Chairperson
17 Seyron Foo, Board Member
18 Amy Welch-Gandy, Office of Professional Examination Services (OPES)
19 Paul Marcille, PhD, Representative of California Psychological Association (CPA)
20 Representative
21 Anushree Belur, Student Representative of California Psychological Association of
22 Graduate Students for The Chicago School of Professional Psychology
23 William Bloxham, Student Representative of JFK University 5th Year Student
24 Cindy Yee-Bradbury, Director of Clinical Training, Representative of UCLA
25 Rene Puliatti, Esq, Representative of California Psychology Internship Council (CAPIC)
26 Lani Chow, PhD, Representative of California Institute of Integral Studies
27 Allison Briscoe-Smith, Representative of The Wright Institute
28 Jay Finkelman, PhD, Representative of The Chicago School of Professional Psychology
29 Alejandra Ojeda-Beck, Student Representative of California Psychological Association
30 of Graduate Students, UC Berkeley
31 Sherri Sedler, Student Representative of California Psychological Association of
32 Graduate Students, California Southern University
33 Olga Belik, PhD, Representative of California Psychological Association (CPA), Division
34 II
35

36 **Others Present:**

37
38 Antonette Sorricks, Executive Officer
39 Stephanie Cheung, Licensing Manager
40 Cherise Burns, Central Services Manager
41 Lavinia Snyder, Examination Coordinator
42 Jason Glasspiegel, Central Services Coordinator
43 Norine Marks, Legal Counsel, Department of Consumer Affairs
44 Jo Linder-Crow PhD, California Psychological Association
45
46

47 **Agenda Item #2: Chairperson Welcome**

48

49 Dr. Casuga welcomed the Task Force members and those in attendance.

50

51 **Agenda Item #3: Public Comment(s) for Items not on the Agenda**

52

53 There were no public comments

54

55 **Agenda Item #4: Approval of EPPP2 Task Force Minutes: April 5, 2018, meeting**

56

57 It was M(Foo)/S(Puliati)/C to accept the minutes as written.

58

59 Dr. Casuga opened the discussion for public comment.

60

61 Mr. Foo asked for lines 100 and 101 to be amended to state: "Mr. Foo stated that the
62 new part of the exam will need to be considered for implementation."

63

64 The motion was amended as follows: it was M(Foo)/S(Puliati) to accept the minutes as
65 amended.

66

67 Vote: 14 Aye, No-0.

68

69 **Agenda Item #5: Review and Discussion of ASPPB's Response to the EPPP2**
70 **Task Force Letter Regarding Questions and Concerns Raised at the April 5, 2018,**
71 **Task Force Meeting**

72

73 Dr. Casuga provided an overview of the item and the response letter.

74

75 Mr. Foo thanked Dr. Matthew Turner, from ASPPB, for attending and asked for an
76 update on the cost of the examination.

77

78 Dr. Turner stated the suggestion to review the different cost per examination options
79 and/or scholarship opportunities was well received by ASPPB, and it is currently under
80 review. No decision has been made, but the Board of Directors will meet again in
81 August.

82

83 Discussion ensued regarding the overall financial impact to students with the addition of
84 the second part of the EPPP and the number of students that take a test prep course,
85 and how this should be considered when discussing the total financial impact.

86

87 Ms. Briscoe-Smith advised that cost is not the only issue. She is concerned about
88 students incorporating the first part of the EPPP into when they would normally be
89 working on their dissertation and applying for internships.

90

91 Discussion ensued regarding how the change to when students can take the first part of
92 the EPPP will affect students' completion of their dissertation and when they begin their
93 internship.

94

95 Mr. Puliatti asked Dr. Turner why students at institutions accredited by Psychological
96 Clinical Science Accreditation System (PCSAS) are not being allowed to apply to
97 ASPPB to take the first part of the EPPP early.

98
99 Discussion ensued regarding concerns over ASPPB's proposal to approve of students
100 at APA accredited institutions to take the first part of the EPPP, and not also approving
101 students at universities that are accredited by PCSAS.

102
103 Mr. Foo clarified that although ASPPB does not plan to approve students at institutions
104 not accredited by APA, each jurisdiction can establish eligibility for applicants.

105
106 Mr. Foo asked Dr. Turner about the response from ASPPB to the Task Force regarding
107 the need for delayed implementation. Mr. Foo advised that the largest states that use
108 the EPPP are California, Texas, and New York, and all three have stated that they will
109 need to delay implementation due to their states respective statutory and regulatory
110 processes.

111
112 Dr. Turner advised that ASPPB is currently reaching out to member boards regarding
113 their specific process and how long it will take to make the changes, and how it will
114 affect the current timeline.

115
116 Dr. Chow referenced a survey sent to the Board Administrators/Registrars Committee
117 (BARC) by the California Board which was provided to the Task Force in the meeting
118 materials. This survey asks which states will require legislative/regulatory change to
119 allow the first part of the EPPP to be taken once coursework has been completed.

120
121 Discussion ensued regarding the responses to this survey, which led into a discussion
122 of the ramifications of California not utilizing the EPPP and how that would affect
123 licensure portability.

124
125 This discussion led into a question from Mr. Foo to Dr. Tracy Montez of the Office of
126 Professional Examination Services, about the examination audit process California uses
127 to verify that examinations meet the standards and suitability for California, and any
128 known history of an examination failing an audit conducted by OPES. Dr. Montez
129 provided information regarding a failed audit for one of the Board of Behavioral
130 Sciences (BBS) license types and how that process worked. Dr. Montez did make the
131 Task Force aware that since that time, the national examination provider has made
132 changes that now allow the examination to be used by BBS as it meets all state
133 standards.

134
135 **Agenda Item #6: Review and Discussion of Examination Sequencing and Timeline**
136 **Scenarios That May Affect Applicants and the Board's Business Processes**
137 **Relating to EPPP2 Implementation**

138
139 Ms. Snyder provided an overview of the different examination sequencing scenarios
140 and staff's recommendation that Option 3 is the most equitable choice.

141
142 It was M(Foo)/S(Belur)/C to adopt option 3 if the Board decides to adopt EPPP step 2.

143
144 Dr. Casuga asked for discussion.

145
146 Dr. Chow asked who would be verifying the completion of academic coursework for the
147 students, which based on the flowchart provided in option 3, would be necessary to take
148 the first part of the EPPP.

149
150 Discussion ensued regarding whether the registrar or training director would be best
151 suited to sign off on completion of academic coursework, and if it is appropriate to ask
152 them to certify such information. Additional discussion ensued regarding how taking the
153 first part of the EPPP early can unintentionally become a requirement to receive an
154 internship.

155
156 Vote: 14 Aye, No-0.

157
158 **Agenda Item #7: Recommendation to the Board in Light of Discussion – Review**
159 **and Determine Possible Statutory Changes to Business and Professions Code**
160 **Sections 2940-2944, and Regulatory Changes to Title 16 of the California Code of**
161 **Regulations, Sections 1388 -1389.1 – Examinations**

162
163 Ms. Snyder provided an overview of the materials. Ms. Sorrick highlighted the starting
164 point for the statutory and regulatory revisions was the work of the Licensing Committee
165 during their review of the pathways to licensure, and clarified that the statutory
166 provisions are not required for EPPP2 adoption. Ms. Snyder read the changes to each
167 section for the Task Force.

168
169 Discussion ensued during the review of section 1388(b) regarding the need for specific
170 failsafe regulatory language that replicates Business and Professions Code sections
171 139 and 2942, which would describe the Board's process should an examination not
172 meet the standards set forth by OPES upon the completion of an occupational analysis.

173
174 Discussion ensued during the review of section 1388(c) regarding the need to specify
175 that completion of academic coursework does not include completion of a dissertation
176 and internship, as these courses generally have a course number through the institution
177 and can therefore be viewed as academic courses.

178
179 It was M(Foo)/S(Belur)/C to accept the language as amended which includes changes
180 to Article 4 of Title 16 of the California Code of Regulations section 1388 to include
181 failsafe regulatory option in section (b) and clarification to the reference of academic
182 coursework in section (c) and refer this language for the Board to consider if the Board
183 decides to continue with the EPPP.

184
185 Vote: 14 Aye, No-0

186
187 **Bus. & Prof. Code sections 2940-2944**

188
189 **§ 2940. Application and fee**

190

191 ~~Each person desiring to obtain a license from the board shall make application to the~~
192 ~~board. The application shall be made upon a form and shall be made in a manner as~~
193 ~~the board prescribes in regulations duly adopted under this chapter.~~

194
195 ~~The application shall be accompanied by the application fee prescribed by Section~~
196 ~~2949. This fee shall not be refunded by the board.~~

197
198 To obtain a license from the board, an applicant shall submit any applications and pay
199 any applicable fees as required by the board.

200
201 *(Amended by Stats. 1997, Ch. 758, Sec. 38. Effective January 1, 1998.)*

202 203 **§ 2941. Examination and fee**

204
205 ~~Each applicant for a psychology license shall be examined by the board, and shall pay~~
206 ~~to the board, at least 30 days prior to the date of examination, the examination fee~~
207 ~~prescribed by Section 2987, which fee shall not be refunded by the board.~~

208
209 Each applicant for licensure as a psychologist shall take and pass any examination
210 required by the board. An applicant may be examined for knowledge in any theoretical
211 or applied fields of psychology, as well as professional skills and judgment in the
212 utilization of psychological techniques and methods, and the ethical practice of
213 psychology, as the board deems appropriate.

214
215 Each applicant shall pay any applicable examination fees.

216
217 *(Amended by Stats. 1997, Ch. 758, Sec. 39. Effective January 1, 1998.)*

218 219 220 **§ 2942. Time for examinations; Passing grades**

221
222 The board may examine by written or computer-assisted examination or by both. All
223 aspects of the examination shall be in compliance with Section 139. The examination
224 shall be available for administration at least twice a year at the time and place and
225 under supervision as the board may determine. The passing grades for the
226 examinations shall be established by the board in regulations and shall be based on
227 psychometrically sound principles of establishing minimum qualifications and levels of
228 competency.

229
230 Examinations for a psychologist's license may be ~~conducted~~ utilized by the board under
231 a uniform examination system, and for that purpose the board may make arrangements
232 with organizations to supply and administer furnishing examination materials ~~material~~ as
233 may in its discretion be desirable.

234
235 *(Amended by Stats. 2005, Ch. 658, Sec. 9. Effective January 1, 2006.)*

236 237 **§ 2943. Examination subjects**

238

239 The board may examine for knowledge in whatever theoretical or applied fields in
240 psychology as it deems appropriate. It may examine the candidate with regard to his or
241 her professional skills and his or her judgment in the utilization of psychological
242 techniques and methods.

243
244 *(Amended by Stats. 1989, Ch. 888, Sec. 24.)*

245
246 **§ 2944. Written examinations**

247
248 The board shall grade the written examination and keep the written examination papers
249 for at least one year, unless a uniform examination is conducted pursuant to Section
250 2942.

251
252 *(Amended by Stats. 1989, Ch. 888, Sec. 25.)*

253
254 **Article 4. of Title 16 of the California Code of Regulations,**
255 **sections 1388-1389.1 – Examination**

256
257 **§ 1388. Examinations.**

258
259 (a) The Board recognizes the expertise of the Department of Consumer Affairs' (DCA)
260 Office of Professional Examination Services (OPES). The Board shall utilize the
261 services of the OPES in licensing examination development and validation through an
262 interagency agreement.

263
264 (b) An applicant for examination shall successfully take and pass the licensing
265 examinations prior to being licensed shall submit to the Board for its approval the
266 required application (exam rev 6/18) and the applicable fee. The licensing examinations
267 shall consist of the Association of State and Provincial Psychology Boards' (ASPPB)
268 Examination for Professional Practice in Psychology (EPPP), which consists of two
269 parts, and the California Psychology Laws and Ethics Examination (CPLEE), except
270 that the EPPP shall be waived for those applicants who meet the criteria in section
271 1388.6 of this chapter. Such applicants shall be required to take and pass the CPLEE.

272
273 (c) An applicant is eligible to take the first part of the EPPP upon completion of all
274 academic coursework of a qualifying doctorate degree. To satisfy this requirement, the
275 applicant shall submit to the Board a written certification from the registrar or training
276 director of the educational institution or program stating that the applicant has
277 completed all required academic coursework (exclusive of internship and dissertation)
278 of a qualifying doctorate degree.

279
280 (ed) An applicant is eligible to take the second part of the EPPP upon passing the first
281 part of the EPPP, completion of a qualifying doctorate degree, and accrual of 1500
282 hours of qualifying supervised professional experience.

283
284 (e) An applicant is eligible to take the CPLEE upon passing shall pass both parts of the
285 EPPP and completion of all of 3000 hours of qualifying supervised professional

286 experience prior to being eligible for the CPLEE, whichever is applicable, pursuant to
287 section 1388.6.

288
289 ~~(df) Upon application, the~~ The Bboard will notify applicants of their eligibility to take each
290 examination ~~the EPPP~~. Applicants are responsible for completing any administrative
291 requirements for taking the EPPP established by ASPPB or its agent, including paying
292 any fees. This subsection applies to those re-taking the EPPP as well as to those taking
293 it for the first time.

294
295 ~~(eg) For forms of the EPPP taken prior to September 1, 2001, the passing score is the~~
296 ~~score that was recognized by the B~~board at that time. For computer administered forms
297 of the EPPP, the Bboard shall accept the passing score recommended by ~~apply a scaled~~
298 ~~score as recommended by~~ ASPPB.

299
300 ~~(fh) Qualified applicants desiring to take the CPLEE shall submit to the B~~board the fee
301 set forth in section 1392 of this chapter. Applicants shall comply with all instructions
302 established by the DCA examination vendor for taking the CPLEE.

303
304 ~~(gi) The passing score on the CPLEE shall be determined for each form of the~~
305 ~~examination by a criterion referenced procedure performed by OPES.~~

306
307 ~~(hj) An applicant for whom English is his or her second language may be eligible for~~
308 ~~additional time when taking the EPPP and/or the CPLEE. The applicant must complete~~
309 ~~and submit a request for additional time that states under penalty of perjury that English~~
310 ~~is his or her second language. The Test of English as a Foreign Language (TOEFL)~~
311 ~~certification score of 85 or below must be sent by Educational Testing Service directly to~~
312 ~~the B~~board. The TOEFL must have been taken within the previous two years prior to
313 application. The Board will only consider the highest score of any TOEFL taken within
314 the previous two years. If approved, the applicant will be allotted time-and-a-half (1.5x)
315 when taking the examination.

316
317 Note: Authority cited: Sections 2930 and 2942, Business and Professions Code.

318 Reference:
319 Sections 123, 496, 2941, 2942, 2943 and 2960, Business and Professions Code.

320
321 **§ 1388.6. License Requirements and Waiver of Examination**
322 **Satisfaction of**
323 **Licensure Requirements.**

324 ~~(a) When a California licensed psychologist has been licensed for at least five years~~
325 ~~and has allowed his/her license to cancel by not renewing the license for at least three~~
326 ~~years, the psychologist shall not be required to take the EPPP.~~

327
328 ~~(ab) If an applicant for licensure as a psychologist has been~~ currently licensed at the
329 doctoral level and has been so for at least two (2) years in another state, Canadian
330 province, or U.S. territory, ~~for at least five years~~ the applicant shall not be required to
331 ~~take the EPPP~~ submit documentation of a passing score on the EPPP.

332

333 (be) An applicant for licensure as a psychologist who holds a Certificate of Professional
334 Qualification (CPQ) issued by the Association of State and Provincial Psychology
335 Boards (ASPPB), shall ~~not be required to take the EPPP~~ submit documentation of a
336 passing score on the EPPP. Such an applicant shall be deemed to have met the
337 educational and experience requirements of subdivisions (b), (c) and (ed) of Code
338 section 2914.

339
340 (cd) An applicant for licensure as a psychologist who is credentialed as a Health Service
341 Provider in Psychology by the National Register of Health Service Providers in
342 Psychology (NRHSPP) and ~~has been~~ who is currently licensed ~~based on a doctoral~~
343 ~~degree~~ at the doctoral level in another state, Canadian province, or U.S. territory for a
344 minimum of five years shall ~~not be required to take the EPPP~~ submit documentation of a
345 passing score on the EPPP. Such an applicant shall be deemed to have met the
346 educational and experience requirements of subdivisions (b), (c) and (ed) of Code
347 section 2914.

348
349 (de) An applicant for licensure as a psychologist who is certified by the American Board
350 of Professional Psychology (ABPP) and ~~has been~~ who is currently licensed ~~based on a~~
351 ~~doctoral degree~~ at the doctoral level in another state, Canadian province, or U.S.
352 territory for a minimum of five years shall ~~not be required to take the EPPP~~ submit
353 documentation of a passing score on the EPPP. Such an applicant shall be deemed to
354 have met the educational and experience requirements of subdivisions (b), (c) and (ed)
355 of Code section 2914.

356
357 (ef) Although ~~the EPPP~~ issome requirements are deemed to have been met ~~waived~~
358 under this section, an applicant must file a complete application and meet all current
359 licensing licensure requirements not addressed above, including payment of any fees,
360 take and pass the California Psychology Law and Ethics Examination (CPLEE), and not
361 been subject to discipline.

362
363 Note: Authority cited: Sections 2930 and 2946, Business and Professions Code.
364 Reference: Section 2946, Business and Professions Code.

365 366 **§ 1389. Reconsideration of Examinations.**

367
368 (a) ~~There shall be no reconsideration of the grade~~ score received on the EPPP or on the
369 CPLEE.

370
371 (b) ~~Nothing in this section shall be construed to deprive an applicant of his or her rights~~
372 of appeal as afforded by other provisions of law.

373
374 Note: Authority cited: Section 2930, Business and Professions Code. Reference:
375 Sections 2942 and 2944, Business and Professions Code.

376 377 **§ 1389.1. Inspection of Examinations.**

378

379 ~~(a) All examination materials, except those owned by an examination service, shall be~~
380 ~~retained by the board at the board's office in Sacramento for a period of two (2) years~~
381 ~~after the date of the examination.~~

382
383 ~~(b) No inspection is allowed of the written examination administered by the board~~
384

385 ~~Note: Authority cited: Section 2930, Business and Professions Code. Reference:~~
386 ~~Sections 2942 and 2944, Business and Professions Code; and Section 12944,~~
387 ~~Government Code~~

388
389 **Agenda Item #8: Recommendations for Agenda Items for Future Task Force**
390 **Meetings.**

391
392 The following recommendations for future task force meetings were received from task
393 force members:

- 394
- 395 • Ms. Briscoe-Smith – Requested a vote on whether the Task Force recommends
396 implementation of the EPPP2
 - 397
 - 398 • Dr. Marcille – Requested that staff collect more information from ASPPB on the items
399 included in the test and how it will test for competency.
 - 400
 - 401 • Mr. Puliatti – Requested that an item is included which asks ASPPB to provide
402 information on how this examination will help protect California consumers.
 - 403
 - 404 • Dr. Belik - Different ASPPB decisions and alternatives and their timelines for
405 implementation of those considerations, including ASPPB's timeline for rollout of the
406 examination.
 - 407
 - 408 • Mr. Bloxham - Requested a true implementation plan with details, validating the test,
409 and when materials will be available.
 - 410
 - 411 • A request to ASPPB for clarification on the lack of PCSAS inclusion.
 - 412
 - 413 • A request to ASPPB for clarification on when the beta testing will be happening and
414 when would results of that beta testing be available.
 - 415
 - 416 • A request to ASPPB for their cost considerations decision.
 - 417
 - 418 • A request for the written charge of Task Force.

419
420 **ADJOURNMENT**

421
422 **The Task force adjourned at 4:12 pm.**

423
424
425
426

Chair

Date



ASPPB

Association of State and
Provincial Psychology Boards

Supporting member jurisdictions in training their responsibility of public protection.

Dear Members of the California Board of Psychology:

Thank you for your inquiry regarding the Enhanced EPPP. We appreciate the ongoing dialogue on this important issue. We hope that our responses will provide some clarity to the concerns raised in your letter.

- *The Board of Psychology supports a competency-based examination but feels that certainty is required as to its mandatory implementation, and that a date certain for all member jurisdictions is necessary. Uncertainty as to implementation results in a current inability to move forward with the required statutory and regulatory changes.*

Thank you for your support of a competency-based examination. We also appreciate the clarity of your explanation regarding California's position on the Enhanced EPPP. Although the ASPPB Board of Directors (BOD) believes that adding a valid, reliable, and legally defensible assessment of skills will prove valuable to jurisdictions, the BOD determined that jurisdictional use of the Enhanced EPPP will not be required during the initial implementation period. Near the end of the early adoption period, the BOD plans to revisit the implementation process of the examination and will determine whether or not to continue delivering the EPPP 1 as a stand-alone option or only to deliver the Enhanced EPPP. Given that California has specific processes and regulatory changes that must occur, we will continue to keep you apprised of the development and status of the implementation of the Enhanced EPPP. ASPPB also recognizes that these regulatory changes may take time and we will work with California to ensure reasonable notice of any changes in requirements for the EPPP.

- *ASPPB would aid its member jurisdictions if it were to identify all statutory and regulatory changes needed to implement the new examination (drafting and supporting statutory and regulatory changes through advocacy, etc.) over a set period of time calibrated to the expected implementation date and the time necessary to effect needed changes.*

In preparation for the development of the Enhanced EPPP, ASPPB staff reviewed the regulations and legislation of the ASPPB member jurisdictions. As a result of that review, we found that most jurisdictions will need little or no statutory changes; however, we understand that is not the case for all jurisdictions. While each jurisdiction will have the specific knowledge about what changes may be needed in its own rules, ASPPB Staff have developed draft language, are available to consult on possible statutory and regulation language changes, and will provide samples of draft language and language that has been used in other jurisdictions.

President, Board of Directors – Gerald O'Brien, PhD | Chief Executive Officer – Mariann Burnetti-Atwell, PsyD

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- *ASPPB should continue to evaluate the total cost of both examinations and establish a uniform lower total cost as to all jurisdictions, as of the mandatory effective date of the Enhanced EPPP.*

The ASPPB BOD heard members' concerns regarding the cost of the EPPP Part 2 and re-evaluated the cost plan. Beginning January 1, 2022, the cost of the EPPP Part 2 will be \$450 for all jurisdictions, rather than \$600 as initially proposed. In addition, jurisdictions that adopt the EPPP part 2 between January 1, 2020 and December 31, 2021 will have a reduced fee (between \$100 and \$300) during this early adoption period.

- *In addition, the Board also requests that ASPPB make available to the Board and the Department of Consumer Affairs' Office of Professional Examination Services the following information as it becomes available:
Data from Beta testing from participating jurisdictions to evaluate the validity of the Enhanced EPPP.
Evidence of external validity that substantiates the need for the Enhanced EPPP.*

Beta testing data from participating jurisdictions will be provided to all member jurisdictions. This information will include data from the Standard Setting process that evaluates the pass point, pass rates, and item level psychometric data. The steps to develop these data will follow the standard procedures used to develop a licensing examination as recommended by the American Educational Research Association, The American Psychological Association, and the National Council on Measurement in Education.

With regard to external validity measures, ASPPB is not conducting these evaluations. External validity is not the standard for development of any licensure exam of any profession, and to the best of our knowledge, very few studies exist that even attempt to assess external validity of a licensing examination. As we mentioned to your Task Force on the EPPP, the primary difficulty with demonstrating external (criterion-related) validity is that establishing an appropriate reliable criterion for which to measure the test is extremely difficult (Raymond & Leucht, 2013). For example, supervisor ratings are known to be unreliable, and direct observations likely lack the psychometric rigor of the exam itself. Therefore, attempts to provide validity data by comparing to such measures are problematic. Because of this, researchers (e.g., Kane 1982, Stocker and Impara 1995, Raymond & Leucht, 2013) have reported for decades that evaluation of licensure exams as a predictive measure is not appropriate or warranted. In fact, Stoker and Impara (p. 184) evaluated the support for criterion related measures and concluded that "at present we would concur with most of our colleagues that licensure boards should not be concerned with criterion related validity." Instead the Enhanced EPPP is constructed based on a rigorous and thorough content validity methodology that follows industry standards. The empirical basis for the use of the Enhanced EPPP is the Job Task Analysis. The 2016 job task analysis surveyed approximately 2700 practicing psychologists in Canada and the United States to determine the knowledge and skills needed for entry level practice as a psychologist. Analysis of the data resulted in the final test specifications that comprise the Enhanced EPPP

(Part 1 and Part 2). Thus, the test specifications are produced through analysis of what practicing psychologists report is required for entry-level practice. Additionally, ASPPB incorporates Subject Matter Experts (licensed psychologists) at every step of the development process to ensure that the examination accurately represents the knowledge and skills required for entry-level practice.

Thank you again for the opportunity to respond to your concerns. As always, please feel free to contact us if we can provide you additional information about the Enhanced EPPP.

Sincerely,

Matt Turner, PhD
ASPPB, Senior Director of Examination Services
mturner@asppb.org

Emil Rodolfa, PhD
ASPPB, Implementation Task Force Chair
erodolfa@alliant.edu

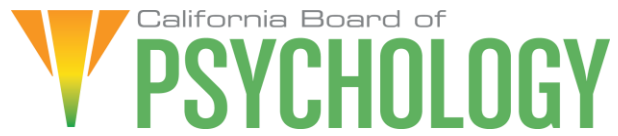
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REVIEW OF THE EXAMINATION FOR
PROFESSIONAL PRACTICE IN PSYCHOLOGY



BOARD OF PSYCHOLOGY

REVIEW OF THE EXAMINATION FOR PROFESSIONAL PRACTICE IN PSYCHOLOGY



April 2021

Heidi Lincer, Ph.D., Chief
Amy Welch Gandy, M.A., Research Data Supervisor II



EXECUTIVE SUMMARY

Licensing boards and bureaus within the California Department of Consumer Affairs (DCA) must ensure that examination programs used in the California licensure process comply with psychometric and legal standards. The California Board of Psychology (Board) requested that DCA's Office of Professional Examination Services (OPES) complete a comprehensive review of the Association of State and Provincial Psychology Boards (ASPPB) Examination for Professional Practice in Psychology (EPPP). The purpose of the OPES review was to evaluate the suitability of the EPPP (Part 1-Knowledge) for continued use in California licensure for psychologists and to evaluate the suitability of the EPPP (Part 2-Skills) for future use in California licensure for psychologists.

The EPPP consists of two parts, Part 1-Knowledge and Part 2-Skills. The Board requires that candidates pass the EPPP Part 1 for licensure in California. The EPPP Part 2 is a new component of the examination that is in the beta testing stage and is used only by states that have already adopted this component for licensure.

OPES, in collaboration with the Board, received and reviewed the ASPPB 2016 EPPP Job Task Analysis Report (2016 Job Task Analysis Report) and other documents provided by ASPPB. Follow-up emails (ASPPB, February–March 2021) were exchanged to clarify the procedures and practices used to validate and develop the EPPP Part 1 and Part 2. OPES performed a comprehensive evaluation of the documents to determine whether the following examination program components met professional guidelines and technical standards: (a) occupational analysis, (b) examination development, (c) passing scores and passing rates, (d) test administration, (e) examination scoring and performance, (f) information available to candidates, and (g) test security procedures.

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.

In October 2020, OPES convened a panel of California psychologists to serve as subject matter experts (SMEs) to review the content of the EPPP Part 1 and Part 2. The SMEs were selected by the Board based on their geographic location, years of experience, and practice specialty. The purpose of the review was to compare the content of the EPPP Part 1 and Part 2 with the California psychologist description of practice resulting from the 2019 California *Occupational Analysis of the Psychologist Profession* (2019 California Psychologist OA) performed by OPES.

Specifically, the SMEs performed a comparison by linking the task and knowledge statements of the 2019 California psychologist description of practice to the examination blueprint of the EPPP Part 1 and the examination blueprint of the EPPP Part 2. The linkage studies were performed to identify whether there were areas of California psychology practice not measured by the EPPP examinations.

Overall, the SMEs concluded that the content of the EPPP Part 1 assesses general knowledge required for entry level psychologist practice in California, with the exception of California law and ethics. This general knowledge should continue to be tested on the California Psychology Law and Ethics Examination.

The SMEs were impressed by the EPPP Part 2, both by the concept of measuring skills and by the design of the scenario-based items. Additionally, the SMEs favored the EPPP Part 2 over the EPPP Part 1 as a single-examination option. However, the SMEs concluded that while the EPPP Part 2 assesses a deeper measure of skills than those measured by the EPPP Part 1, that alone may not support adoption of the EPPP Part 2. The SMEs further concluded that the skills measured by the EPPP Part 2 may be adequately assessed during supervised clinical experience, and that the EPPP Part 2 could possibly be an unnecessary barrier to licensure. OPES recommends that the Board continue to monitor the beta testing results of the EPPP Part 2 as part of their decision-making process for adopting the EPPP Part 2 as a requirement for licensure in California in the future.



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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.

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
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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*.¹ 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 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)² 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 performance³. 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 higher². 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 or telephone at (678) 216-1175. Thank you.

References

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Supporting member jurisdictions in fulfilling their responsibility of public protection

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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*"¹, 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

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

From: Adina Goodman <adina.goodman@gmail.com>

Sent: Tuesday, October 25, 2022 12:39 PM

To: bopmail@DCA <bopmail@dca.ca.gov>; info@floridapsychology.gov; psychbd@nysed.gov; ST-PSYCHOLOGY@pa.gov; info@psy.ohio.gov; info@ncpsychologyboard.org; BPLHelp@michigan.gov

Subject: Stop the adoption of the EPPP2

WARNING: This message was sent from outside the CA Gov network. Do not open attachments unless you know the sender: adina.goodman@gmail.com

Dear Board of Psychology,

I am writing to ask you to vote against the implementation of the EPPP Part 2 in our state. Creating a new, expensive, time-consuming barrier to licensure is not what our state needs and will serve to harm rather than protect the public.

- EPPP-2 will create new barriers to practice amidst a national mental health crisis. Escalating rates of mental health concerns nationwide have intensified pre-existing provider shortages. Adding EPPP-2 is likely to slow down the progress of licensure for candidates when additional health service psychologists are urgently needed.
- EPPP-2 will further restrict diversity in the field. Several studies using data obtained by the Freedom of Information Act and surveys of early career psychologists show alarming racial disparities in EPPP-1 pass rates. Existing research on the EPPP Part 1 suggests that Black and Latinx psychology candidates fail the exam at two to four times the rate as white candidates, creating unnecessary constriction of the workforce pipeline for psychologists of color. Adding another standardized test likely to yield the same disparities is both antithetical to the principle of justice central to the ethical conduct of psychology and the immediate needs of the individuals and communities that psychologists serve. This restriction may also increase jurisdictions' risk of claims of violations of federal civil rights laws.
- EPPP-2 will not contribute meaningfully to enhancing protection of the public. There is no evidence that EPPP-2 is an improvement over, or even as good as, existing evaluation methods in protecting the public. Supervisor competency ratings of psychology trainees, based on repeated assessment over thousands of hours of clinical experience, have been shown to be associated with key client outcomes, including attrition and change in the severity of symptoms over the course of treatment. There is no evidence that a multiple-choice test would outperform those supervisory observations. In contrast, evidence suggests that EPPP-2 scores will be more strongly related to other factors, such as test-taking ability and general cognitive factors, than to competence in service delivery. Furthermore, the predicted 95% pass rate for candidates who have passed EPPP-1 suggests that the exams are highly redundant and lack incremental validity.
- EPPP-2 creates new financial burdens for trainees. The EPPP-2 is expected to nearly double the cost for licensure testing to approximately \$1200 per candidate, plus additional costs of test preparation materials, study time, and lost productivity and income potential during the extended timeline to licensure. On top of substantial educational debt (\$120,000 median) and financial stress, and the likelihood of disproportionate impact on first-generation and low-income candidates who are already underrepresented in the psychology workforce, increasing the financial burden on psychology licensure candidates for an exam without compelling data that it will improve the quality or safety of the psychology workforce is unacceptable.

- Prior attempts to address these concerns with ASPPB have not yielded substantive change. The concerns detailed above have been raised in multiple forms, by various groups of stakeholders, over a period of several years. In response to these concerns, ASPPB invited a small group of stakeholders and ASPPB representatives to form an advisory group. After over a year of work, the Director of Examination Services released a presentation dismissing and mischaracterizing the group as supporting the validity of the current exam, severely rupturing trust in the advisory process. These events do not suggest that ASPPB is willing to address stakeholder concerns or make alterations to their planned exam rollout.

ASPPB has not yet met the burden of proof that this proposed exam adds value to the licensure process. What is certain is that it will slow down the licensure process in the midst of existing provider shortages, and create unnecessary and disproportionate burdens on psychology candidates from underrepresented backgrounds. This is not the change our field needs. I urge you to vote no on the implementation of the EPPP2 in our state.

From: Boyd, Kenny (LLU) <kboyd@llu.edu>
Sent: Tuesday, October 25, 2022 11:02 AM
To: bopmail@DCA <bopmail@dca.ca.gov>
Subject: EPPP 2

WARNING: This message was sent from outside the CA Gov network. Do not open attachments unless you know the sender: kboyd@llu.edu

Dear CA Board of Psychology (this is not a form email):

In examining the studies of the EPPP, and what we know about the EPPP 2, it seems we should wait until the psychometric studies of the EPPP 2 are published before adopting it in California.

However, the predictive validity of the current EPPP (1) is not promising, as it seems to be related to SES and general intelligence most strongly, rather than professional skill or ability.

If the data on the EPPP2 is more predictive of professional skill or ability, you may want to substitute it for the EPPP 1!

This may not be possible, so at least I think it's reasonable to keep the status quo until actual data on the EPPP 2 comes in from states where it's been in use.

Thank you for your time and attention to these issues.

Kenny Boyd
PSY 20626

Kendal C. Boyd, Ph.D., M.A. (he/him)
Associate Chair
Program/Clinical Director, Psy.D.Degree
Loma Linda University Psychology Dept.
(909) 558-8574
PSY 20626

From: Heidi Zetzer <heidi.zetzer@ucsb.edu>
Sent: Wednesday, October 26, 2022 8:50 AM
To: bopmail@DCA <bopmail@dca.ca.gov>
Subject: Please please please vote against the adoption of the EPPP-2!

WARNING: This message was sent from outside the CA Gov network. Do not open attachments unless you know the sender: hzetzer@ucsb.edu

Dear BOP,

I am a licensed psychologist, university professor, former training clinic director, and former president of the Association of Psychology Training Clinics and the Santa Barbara County Psychological Association. I was president of APTC when we signed on with the Council of University Directors of Clinical Psychology (CUDCP), which submitted its first letter to ASPPB, opposing the adoption of the EPPP-2 (see attached letter dated October, 2018, signed by numerous training councils). Despite continued disagreement over the necessity, validity, and cost of the EPPP-2, ASPPB has continued to push it forward. ASPPB has failed to demonstrate the need for yet another barrier to licensure, which will be a greater impediment to potential licensees who cannot readily afford the cost of the exam or the test preparation that it requires. As a summary of the issues, I pasted in the letter that is currently being circulated among the training councils and across divisions of the American Psychological Association (see below). This is not the time to add yet another gate to the profession, especially one which has been examined carefully by experts in training and psychometrics, who have found no good reason to implement this additional exam and raised questions about its validity. I urge you to vote NO on its adoption.

**Sincerely,
Heidi A. Zetzer, Ph.D.**

We the undersigned, as stakeholders in the training of health service psychologists, take seriously the shared responsibility to engage in effective, fair, and unbiased processes of evaluation on the pathway to licensure as a psychologist. In light of those values and commitments, we are writing to express grave ongoing concerns about the proposed implementation of the EPPP-2. Many of these concerns have been expressed in prior publications and communications with the ASPPB, by multiple stakeholders across the profession and over several years. These concerns are amplified by ASPPB's current plans to pursue EPPP-2 implementation despite minimal progress and new barriers to mutually agreeable resolutions. As a result, we feel it is essential to highlight some of the most substantial ongoing concerns and to reiterate the critical importance of a truly collaborative approach to improving the licensure examination process if the profession wants to protect and serve a diverse public by ensuring a workforce that is both qualified and representative.

● **Prior attempts to address these concerns with ASPPB have not yielded substantive change.** The concerns detailed above have been raised in multiple forms, by various groups of stakeholders, over a period of several years. In response to these concerns, ASPPB invited a small group of stakeholders and ASPPB representatives to form an advisory group. After over a year of work, the Director of Examination Services released a presentation dismissing and mischaracterizing the group as supporting the validity of the current exam, severely rupturing trust in the advisory process. These events do not suggest that ASPPB is willing to address stakeholder concerns or make alterations to their planned exam rollout.

● **EPPP-2 will create new barriers to practice amidst a national mental health crisis.** Escalating rates of mental health concerns nationwide have intensified pre-existing provider shortages.^{1,2,3} Adding EPPP-2 is likely to slow down the progress of licensure for candidates when additional health service psychologists are urgently needed.

● **EPPP-2 will further restrict diversity in the field.** Several studies using data obtained by the Freedom of Information Act and surveys of early career psychologists show alarming racial disparities in EPPP-1 pass rates.^{4,5,6,7} Adding another standardized test likely to yield the same disparities is both antithetical to the principle of justice central to the ethical conduct of psychology and the immediate needs of the individuals and communities that psychologists serve. This restriction may also increase jurisdictions' risk of claims of violations of federal civil rights laws.

● **EPPP-2 will not contribute meaningfully to enhancing protection of the public.** There is no evidence that EPPP-2 is an improvement over, or even as good as, existing evaluation methods in protecting the public. Supervisor competency ratings of psychology trainees, based on repeated assessment over thousands of hours of clinical experience, have been shown to be associated with key client outcomes, including attrition and change in the severity of symptoms over the course of treatment.⁸ In contrast, evidence suggests that EPPP-2 scores will be more strongly related to other factors, such as test-taking ability and general cognitive factors, than to competence in service delivery.⁴ Furthermore, the predicted 95% pass rate for candidates who have passed EPPP-1 suggests that the exams are highly redundant and lack incremental validity.

● **EPPP-2 creates new financial burdens for trainees.** The EPPP-2 is expected to nearly double the cost for licensure testing to approximately \$1200 per candidate, plus additional costs of test preparation materials, study time, and lost productivity and income potential during the extended timeline to licensure. On top of substantial educational debt (\$120,000 median) and financial stress,^{9,10} and the likelihood of disproportionate impact on first-generation and low-income candidates who are already underrepresented in the psychology workforce, increasing the financial burden on psychology licensure

candidates for an exam without compelling data that it will improve the quality or safety of the psychology workforce is unacceptable.

In sum, as a group of nationwide training councils with member institutions that span all licensure jurisdictions, these co-signers remain deeply concerned about the negative impact of the proposed EPPP-2 on psychology candidates, the patients and communities we serve, and the field as a whole. We strongly advocate for a process that:

1. Implements specific action steps to address **each** of the concerns raised by the discipline's stakeholders. We recognize that ASPPB has taken some steps in this direction (e.g., altered fee structure), but the most critical and fundamental concerns remain.
2. Demonstrates readiness of ASPPB or whatever body ultimately oversees the discipline's licensure process to work with the communities of interest in a truly collaborative manner.

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The land on which I live and work is the ancestral territory of the Chumash People. "The federal government took possession of the ceded lands in California without acknowledgement or consent from the Indian nations traditionally living on those lands" ([Indian Country Today, Digital Version, Sept 12, 2018](#)). See also [Land Acknowledgement and the WISHTOYO Chumash Foundation](#) and [Santa Ynez Band of Chumash](#).

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From: Jason L <jclevine23@gmail.com>
Sent: Tuesday, October 25, 2022 12:18 PM
To: bopmail@DCA <bopmail@dca.ca.gov>; info@floridapsychology.gov; psychbd@nysed.gov; ST-PSYCHOLOGY@pa.gov; info@psy.ohio.gov; info@ncpsychologyboard.org; BPLHelp@michigan.gov
Subject: ADOPT the EPPP2

WARNING: This message was sent from outside the CA Gov network. Do not open attachments unless you know the sender: jclevine23@gmail.com

Dear Board of Psychology,

I am writing to ask you to vote FOR the implementation of the EPPP Part 2 in our state. Critics are arguing that it will cause economic burden on graduates and "harm" to the public. This is hyperbole and simply unfounded conjecture.

Well conceived and justifiable barriers, such as standardized board licensing exams, are important to ensure competent training of professionals, and public and consumer safety. The current state of professional psychology is an embarrassing mess, with poorly operationalized standards and a lack of oversight from accrediting bodies. Expediting graduation and licensure is only exacerbating the problem and putting the public safety and trust at risk.

There is no evidence that the EPPP-2 is systemically discriminatory. Evidence of racial disparities in the field cannot be simply interpreted as "racist". This knee-jerk reaction turned criticism is intellectually dishonest and evidence of political creep in professional psychology.

The cost of EPPP-2 administration is an exaggeration and non-issue, especially in light of the cost of accredited for-profit professional schools.

Organizations such as APA and CUDCP have been unfortunately misguided in recent years. They have become intoxicated with political ideology and function as political activists, at the cost of slowing the advancement of graduate education in professional psychology and serving the public good.

MEMORANDUM

DATE	April 28, 2023
TO	EPPP ADHOC Committee Members
FROM	Antonette Sorrick Executive Officer
SUBJECT	Agenda Item #6: Discussion and Possible Approval of the EPPP – Part 2 (Skills) Exam Effective January 1, 2026

Currently the Board only requires the Examination for Professional Practice in Psychology (EPPP) Part 1 (knowledge-based exam) as one of the exam requirements for California licensure. Effective January 1, 2026, ASPPB will only be offering the EPPP as a two-part examination.

If the Board decides to implement the EPPP as a two-part exam effective January 1, 2026, license portability will remain. Statutory and regulatory adjustments will be necessary and the current business processes will need to be revisited to streamline the transition to the new requirement.

The issues addressed at previous meetings are as follows:

- 1) The additional cost CA candidates will have to shoulder in order to take the EPPP. The cost, beginning 1/1/2026, will be \$1050 (EPPP1=\$600.00 + EPPP2=\$450) to take both exams. This cost does not include the administrative costs (\$87.50) charged by the exam vendor (Pearson Vue) to candidates every time an exam is taken. Anticipated annual cost breakdown of fees paid to ASPPB and Pearson Vue are as follows:

Average Candidates Annually	EPPP 1 (X \$600)	Administrative Code (X \$87.50)	EPPP 2 (X \$450)	Administrative Cost (X \$ 87.50)
1500	\$900,000	\$131,250	\$675,000	\$131,250

Total Fees paid to ASPPB annually= \$1,575,000
 Total Fees paid to Pearson Vue annually = \$262,500

- 2) Another issue raised is a second EPPP exam would be considered another barrier towards licensure. This was the general consensus by CA SMEs when the Department's Office of Professional Examination Services (OPES) conducted its audit of the EPPP. They concluded that "although the EPPP Part 2 assesses a deeper measure of skills than those measured by the EPPP Part 1, that alone

may not support adoption of the EPPP Part 2. That the skills measured by the EPPP Part 2 may be adequately assessed during supervised clinical experience, and that the EPPP Part 2 could possibly be an unnecessary barrier to licensure.” The summary of the audit is attached (Attachment A).

The alternative, if the Board decides not to implement the EPPP, the Board would be responsible for developing and administering their own knowledge-based exam. According to OPES, the development of such an exam would combine both knowledge and laws and ethics into one single exam for California candidates. The estimated cost associated for creating a licensure exam is provided below.

Occupational Analysis (conducted once every 7 years)	\$ 68,500 (this is on the high side)
Exam Development	\$ 60,440 (Attachment B)
Item writing textbooks required	\$ 5,000 (This is an ongoing cost to update books as needed)
SME Workshop Cost	\$ 30,000 (fees may vary annually depending on the number of SMEs and workshops)
Exam Administration Cost	\$ 37,000 (fees may vary annually depending on the number of candidates taking the exam)
Total Initial Cost	\$200,940

OPES will need to initially develop two forms of the exam per year; once the exam becomes more established additional forms of the exam can be added per year. Adding different exam versions will increase administration cost.

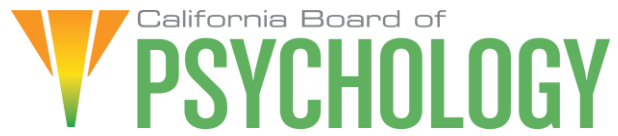
This option will eliminate portability for California candidates/licensees who wish to seek licensure in another state. Candidates/licensees who wish to move out of state will need to adhere to those state licensure guidelines including taking the national exam. The Board will also need to revisit our statutory and regulatory guidelines pertaining to examinations.

Attachment/s:

- Attachment A: OPES, EPPP Audit Summary
- Attachment B: OPES’ Estimated exam development cost

Action Requested:

Staff recommendation: to continue to use ASPPB for the licensure exam due to the initial and ongoing costs of a California-specific exam and concerns regarding the portability of a California license.



REVIEW OF THE EXAMINATION FOR
PROFESSIONAL PRACTICE IN PSYCHOLOGY



BOARD OF PSYCHOLOGY

REVIEW OF THE EXAMINATION FOR PROFESSIONAL PRACTICE IN PSYCHOLOGY



April 2021

Heidi Lincer, Ph.D., Chief
Amy Welch Gandy, M.A., Research Data Supervisor II



EXECUTIVE SUMMARY

Licensing boards and bureaus within the California Department of Consumer Affairs (DCA) must ensure that examination programs used in the California licensure process comply with psychometric and legal standards. The California Board of Psychology (Board) requested that DCA's Office of Professional Examination Services (OPES) complete a comprehensive review of the Association of State and Provincial Psychology Boards (ASPPB) Examination for Professional Practice in Psychology (EPPP). The purpose of the OPES review was to evaluate the suitability of the EPPP (Part 1-Knowledge) for continued use in California licensure for psychologists and to evaluate the suitability of the EPPP (Part 2-Skills) for future use in California licensure for psychologists.

The EPPP consists of two parts, Part 1-Knowledge and Part 2-Skills. The Board requires that candidates pass the EPPP Part 1 for licensure in California. The EPPP Part 2 is a new component of the examination that is in the beta testing stage and is used only by states that have already adopted this component for licensure.

OPES, in collaboration with the Board, received and reviewed the ASPPB 2016 EPPP Job Task Analysis Report (2016 Job Task Analysis Report) and other documents provided by ASPPB. Follow-up emails (ASPPB, February–March 2021) were exchanged to clarify the procedures and practices used to validate and develop the EPPP Part 1 and Part 2. OPES performed a comprehensive evaluation of the documents to determine whether the following examination program components met professional guidelines and technical standards: (a) occupational analysis, (b) examination development, (c) passing scores and passing rates, (d) test administration, (e) examination scoring and performance, (f) information available to candidates, and (g) test security procedures.

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.

In October 2020, OPES convened a panel of California psychologists to serve as subject matter experts (SMEs) to review the content of the EPPP Part 1 and Part 2. The SMEs were selected by the Board based on their geographic location, years of experience, and practice specialty. The purpose of the review was to compare the content of the EPPP Part 1 and Part 2 with the California psychologist description of practice resulting from the 2019 California *Occupational Analysis of the Psychologist Profession* (2019 California Psychologist OA) performed by OPES.

Specifically, the SMEs performed a comparison by linking the task and knowledge statements of the 2019 California psychologist description of practice to the examination blueprint of the EPPP Part 1 and the examination blueprint of the EPPP Part 2. The linkage studies were performed to identify whether there were areas of California psychology practice not measured by the EPPP examinations.

Overall, the SMEs concluded that the content of the EPPP Part 1 assesses general knowledge required for entry level psychologist practice in California, with the exception of California law and ethics. This general knowledge should continue to be tested on the California Psychology Law and Ethics Examination.

The SMEs were impressed by the EPPP Part 2, both by the concept of measuring skills and by the design of the scenario-based items. Additionally, the SMEs favored the EPPP Part 2 over the EPPP Part 1 as a single-examination option. However, the SMEs concluded that while the EPPP Part 2 assesses a deeper measure of skills than those measured by the EPPP Part 1, that alone may not support adoption of the EPPP Part 2. The SMEs further concluded that the skills measured by the EPPP Part 2 may be adequately assessed during supervised clinical experience, and that the EPPP Part 2 could possibly be an unnecessary barrier to licensure. OPES recommends that the Board continue to monitor the beta testing results of the EPPP Part 2 as part of their decision-making process for adopting the EPPP Part 2 as a requirement for licensure in California in the future.

6. Item Review Workshop										
Prepare for one 2-day workshop	8	\$ 576					2	\$ 104	\$ 680	
Conduct one 2-day workshop	16	\$ 1,152	4	\$ 408					\$ 1,560	
Perform post workshop activities	24	\$ 1,728			8	\$ 536			\$ 2,264	
										\$ 4,504
7. Exam Construction Workshop										
Prepare for one 2-day workshop	16	\$ 1,152					4	\$ 208	\$ 1,360	
Conduct one 2-day workshop	16	\$ 1,152	4	\$ 408					\$ 1,560	
Perform post workshop activities	8	\$ 576							\$ 576	
Develop examination	24	\$ 1,728			8	\$ 536			\$ 2,264	
										\$ 5,760
8. Passing Score Workshop										
Prepare for one 2-day workshop	8	\$ 576					2	\$ 104	\$ 680	
Conduct one 2-day workshop	16	\$ 1,152	4	\$ 408					\$ 1,560	
Analyze data, prepare report of findings	8	\$ 576							\$ 576	
										\$ 2,816
9. Publish Examination										
Prepare final copy of examination	16	\$ 1,152			8	\$ 536			\$ 1,688	
Prepare examination for CBT	12	\$ 864							\$ 864	
										\$ 2,552
10. Item Review Workshop										
Prepare for one 2-day workshop	8	\$ 576					2	\$ 104	\$ 680	
Conduct one 2-day workshop	16	\$ 1,152	4	\$ 408					\$ 1,560	
Perform post workshop activities	24	\$ 1,728			8	\$ 536			\$ 2,264	
										\$ 4,504
11. Exam Construction Workshop										
Prepare for one 2-day workshop	16	\$ 1,152					4	\$ 208	\$ 1,360	
Conduct one 2-day workshop	16	\$ 1,152	4	\$ 408					\$ 1,560	
Perform post workshop activities	8	\$ 576							\$ 576	
Develop examination	24	\$ 1,728			8	\$ 536			\$ 2,264	
										\$ 5,760
12. Passing Score Workshop										
Prepare for one 2-day workshop	8	\$ 576					2	\$ 104	\$ 680	
Conduct one 2-day workshop	16	\$ 1,152	4	\$ 408					\$ 1,560	
Analyze data, prepare report of findings	8	\$ 576							\$ 576	
										\$ 2,816
13. Publish Examination										
Prepare final copy of exam	16	\$ 1,152			8	\$ 536			\$ 1,688	
Prepare two forms of examination for CBT	12	\$ 864							\$ 864	
										\$ 2,552
Administrative Support										
Technical oversight (40 hours @ \$76/hour)									\$ 3,040	
Cost oversight (40 hours @ \$61/hour)									\$ 2,440	
										\$ 5,480
TOTAL	596	\$ 42,912	44	\$ 4,488	88	\$ 5,896	32	\$ 1,664	\$ 60,440	\$ 60,440