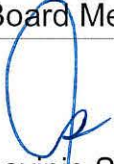


MEMORANDUM

| | |
|----------------|--|
| DATE | May 10, 2018 |
| TO | Board Members |
| FROM |  Lavinia Snyder Examination Coordinator |
| SUBJECT | Agenda Item #25: EPPP2 Task Force Report |

Background:

The Board's first Examination for Professional Practice in Psychology Part 2 (EPPP2) Task Force meeting was held on April 5, 2018. This 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, the 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 will be presented at the next EPPP2 Task Force meeting which is scheduled to be held on June 29, 2018, at the Department of Consumer Affairs in Sacramento.

For additional information regarding EPPP Part 1 and Part 2 we have included a FAQ sheet from ASPPB's website (Attachment B).

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

Attachment B: ASPPB FAQ regarding the EPPP Part 1 & 2

Action Requested:

No action is required, at this time. This item is for informational purposes only.

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.

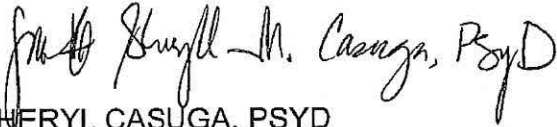
- Would ASPPB consider a mechanism to make the cost of the examination more affordable for low-income applicants or for those serving impoverished communities, underserved populations, or performing services in public agencies? For instance, would there be consideration to lower the cost of the EPPP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



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

Attachment B
ASPPB FAQ regarding the EPPP Part 1 & 2



ASPPB

Association of State and
Provincial Psychology Boards

The Examination for Professional Practice in Psychology (EPPP Part 1 and 2): Frequently Asked Questions

What is the EPPP?

Beginning January 2020, the EPPP will become a two-part psychology licensing examination. The EPPP Part 1 is currently used throughout the U.S. and Canada, to assess the foundational knowledge of psychology deemed necessary for entry level licensure. The EPPP Part 2 will assess the practice skills in psychology deemed necessary for entry level licensure. The EPPP has been in existence for over 50 years, to assist psychology licensing boards/colleges in making determinations regarding the readiness of psychology licensure candidates to practice independently. The profession of psychology has progressed to a “culture of competence”; based on this change in the culture of the profession, feedback from ASPPB members, and a number of other factors, the ASPPB Board of Directors decided that it was time to develop an assessment of practice skills, i.e., the EPPP Part 2.

What is the EPPP Part 2?

The EPPP Part 2 will be a computer-based examination designed to assess the practice skills needed for the independent practice of psychology. It will be an enhancement to the current EPPP which assesses the foundational knowledge of the profession, the EPPP Part 2 will assess a candidate’s ability to apply that knowledge in a practical sense (assessing their skills). Together, the two parts of the EPPP will enhance a licensing board’s ability to assess the competence of their candidates’ readiness for independent practice. Beginning in January 2020, the EPPP will only be administered as a two-part exam.

Why has ASPPB developed the EPPP Part 2 now?

ASPPB’s primary mission is to assist its member boards (all psychology licensing boards in the U.S. and Canada) in meeting their mandate of public protection. State and college licensing boards have a responsibility to ensure that the psychology professionals they license are competent to practice. Competence is defined as the integrated and consistent use of the knowledge, skills, attitudes and values of a profession. Although ASPPB has been successfully utilizing the EPPP to assess the foundational knowledge of the psychology professionals for over 50 years, the psychology licensing boards and colleges have had to rely on supervisor ratings for information about licensure candidates’ practice skills. The research suggests that due to supervisor’s conflicting roles, they have difficulty providing accurate evaluations of their supervisees to psychology licensing boards; who have to evaluate the supervisee’s competency from the evaluations. To further complicate the issue of assessing for competency,

accredited psychology programs have several training models that are used in preparing students for entry into the profession. The differences in training models result in highly variable EPPP pass rates, ranging from 13 - 100% of the students passing from program to program. There is also a large variability in the type, quality and quantity of practicum experiences required by accredited programs, not to mention that many psychology graduates come from non-APA or CPA accredited programs. The issues of variability and lack of standardization in training and supervised experience make it more complicated to ensure candidate competency for independent practice. As stated previously, the profession of psychology has entered into a “culture of competence” and there is now an essential agreement among many key professional groups (e.g., American Psychological Association’s Commission on Accreditation, Canadian Psychological Association, Association of Canadian Psychology Regulatory Organizations and Association of State and Provincial Psychology Boards) regarding the necessary competencies to practice independently. This agreement was a necessary pre-condition to initiating the development of a skills examination. In addition, we now have the technology available to assess practice skills via a computer-based examination which allowed ASPPB to avoid having to develop a costly and time consuming standardized examination involving person to person (mock patient/client) scenarios. ASPPB concluded that it is the appropriate time to develop a **standardized** examination to assess the skills necessary for independent practice as a psychologist. With the enhanced EPPP, psychology licensing boards will have available to them an examination that will offer a standardized, reliable and valid method of assessing both the foundational knowledge (EPPP Part 1) and the practice skills (EPPP Part 2) necessary for independent practice.

How does the EPPP Part 2 differ from the EPPP Part 1?

The EPPP Part 2 will provide an examination of the practice skills one needs for independent practice of psychology. The practice skills that will be assessed by the EPPP Part 2 are based on the “ASPPB Competencies Expected of Psychologists at the Point of Licensure” model that was validated by the ASPPB 2016 Job Task Analysis. These skills include:

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

Conversely, the EPPP Part 1 measures the foundational knowledge required for the independent practice of psychology in the domains of:

- Biological Bases of Behavior
- Cognitive and Affective Bases of Behavior
- Social and Cultural Bases of Behavior

Growth and Lifespan Development
Assessment and Diagnosis
Treatment, Intervention, Prevention and Supervision
Research Methods and Statistics
Ethical, Legal and Professional Issues

How will the EPPP Parts 1 and 2 be implemented?

The EPPP will be a two part exam. Once the EPPP Part 2 (skills) is available in January 2020, there will be an Early Admittance option for the EPPP Part 1 (knowledge) exam. Eligible students and trainees will be able to take the EPPP Part 1 before they have finished their degree, but after they have completed all academic coursework (excluding research, practicum or internship). ASPPB will register those who want to take EPPP Part 1 pre-degree if they come from academic programs that are consistent with the *ASPPB Model Act and Rules* (i.e., APA or CPA accredited programs for health care providers). All others (e.g., international applicants, those who do not want to take the EPPP Part 1 pre-degree, those who come from academic programs that are not consistent with the *ASPPB Model Act and Rules*) may register for the EPPP Part 1 exam once they are candidates for licensure in their home jurisdictions (state or province). The EPPP Part 2 (skills) can only be taken post-degree, once an applicant is a candidate for licensure in a jurisdiction, and the candidate has passed the EPPP Part 1 (knowledge). Each jurisdiction will approve candidates to register for the EPPP Part 2 (skills). As it is a skills examination, ASPPB recommends that the EPPP Part 2 be taken after all supervised experience requirements for licensure have been completed.

Will the EPPP Part 1 and Part 2 be a computer-based examination?

Yes, both parts of the EPPP will be computer-based. The EPPP Part 1 (knowledge) is a traditional multiple-choice examination. The EPPP Part 2 (skills) will contain both “innovative item types” (i.e., vignettes, avatars, sequencing and scaffolding items, use of exhibits that accompany questions, items with multiple correct responses) and traditional multiple-choice items.

Does the EPPP Part 2 add to the assessment of competence; will it be valid, reliable, and legally defensible?

Yes, the EPPP Part 2 (skills) will add to the comprehensive assessment of competence. Using an examination that measures both foundational knowledge and practice skills. ASPPB’s intent is to provide jurisdictions (state or province) with a valid, reliable, standardized and legally defensible measure of the foundational knowledge and practice skills needed to practice psychology independently.

In 2016, ASPPB conducted a Job Task Analysis to revalidate the “blueprint” for the EPPP Part 1 (knowledge), as well as to validate the competency model that is foundational to the development of the EPPP Part 2 (skills). ASPPB, assisted by our test vendor Pearson VUE, followed the most current test development standards for the revalidation of the EPPP Part 1 (knowledge) and the development of the

EPPP Part 2 (skills). Similar Job Task Analyses have periodically been conducted over the last 50 years for the EPPP Part 1 (knowledge) according to the most accepted test development standards each time. More details about the validity of the EPPP Part 2 (skills) are available at the end of this document.

Is the EPPP Part 2 just for Health Service Psychologists or is it for all psychology service providers?

The EPPP Part 2 (skills), like the current EPPP, will be designed for all psychology service providers (i.e., Health Service Psychologists and General Applied Psychologists) who must be licensed in order to practice independently as psychologists.

Will the EPPP Part 2 also be for those taking the examination under a Master's license requirement?

Yes, just as jurisdictions (state or province) currently use the EPPP as a requirement for independent licensure regardless of the degree level, the EPPP Part 2 (skills) will be used for that purpose as well. Jurisdictions that license at the Master's level of training for independent psychology practice will use both parts of the EPPP Part 1 and Part 2 to assess their Master's level candidates. (Some jurisdictions also license at the Master's or pre-doctoral level for supervised practice. The EPPP Part 2 (skills) will be required for those individuals as well.)

Is the EPPP Part 2 going to be used for already licensed psychologists when they renew their licenses?

The EPPP Part 2 (skills) is being developed for entry-level licensure. It has not been conceptualized, nor is it being developed for use in assessing maintenance of competence for already licensed psychologists. Just as the EPPP is not used to assess maintenance of competence, the enhanced EPPP, including the EPPP Part 2 (skills), will assess entry-level competence to practice at the independent level. **ASPPB recommends that the EPPP Part 2 not be administered to any psychologist licensed prior to January 1, 2020.**

What will the EPPP Part 2 cost?

The test fee for Part 1 and Part 2 of the EPPP will be \$600 for each part and will be due when candidates are ready to take that part of the exam. ASPPB is sensitive to the financial stresses for those entering the psychology profession and have been committed to keeping costs as low as possible. Developing a high cost examination, particularly one that will use computer-based simulations, taped scenarios and vignettes, and avatars, requires considerable up-front and ongoing costs. ASPPB will operate the program in a cost-efficient manner that will maintain the affordability of program in the years ahead.

Will the EPPP Part 2 include essay questions?

The EPPP Part 2 (skills) is being designed to include a number of innovative question types, such as the use of avatars, the review of test protocols, and multiple-choice questions requiring that multiple correct answers be selected. Since the examination will be computer delivered and scored, it will not include essay questions.

Will candidates receive their examination results unofficially at the examination site?

Yes, candidates will receive a score at the examination site. This score, however, will not be official until it has been received and confirmed by the state or college licensing boards.

In my jurisdiction, the board requires an oral examination. Will I still be required to take it if I am taking the EPPP Part 2?

The determination of requirements for psychology licensure is the domain of the state and college licensing boards where a candidate applies for licensure. The EPPP Parts 1 and 2 are tools that the licensing boards will have available to them for use in their determination of eligibility of the candidates for licensure as psychologists. The state and college licensing boards in each jurisdiction will decide if an oral examination will be required.

Will there be accommodations for those with identified disabilities?

Requests for examination accommodations will be considered if candidates meet the terms outlined in either the Americans With Disabilities Act, if they are an American candidate or the Human Rights legislation, in their home province, if they are a Canadian candidate. Requests for accommodations must be sent in writing to the state or college licensing board (or to ASPPB directly in the case of the early admittance for the EPPP Part 1 (knowledge)) and must include the accommodations requested and medical/professional documentation supporting the request. The candidate must be approved for accommodations. Reasonable requests that do not impact the validity or the security of the examination, will be considered.

Will there be a limit on how many times I can take the EPPP Part 2?

This issue is being discussed by ASPPB and its member jurisdictions (states and provinces). Information about the number of times the EPPP Part 2 (skills) can be taken will be posted as soon as a decision has been made.

How much time will be allowed to take the EPPP Part 2?

The amount of time that will be allowed to take the EPPP Part 2 (skills) will be 4 hours and 15 minutes, which is the same amount of time as that allowed to take the EPPP Part 1 (knowledge).

Can I take the EPPP Part 1 or Part 2 before I apply for licensure?

Once the EPPP Part 2 (skills) is available in January 2020, there will be an Early Admittance option for the EPPP Part 1 (knowledge) exam. Eligible students and trainees will be able to take the EPPP Part 1 (knowledge) before they have finished their degree or applied for licensure, but after they have completed all academic coursework (excluding research, practicum or internship). However, candidates must apply for licensure to a state or college licensing board that will approve the candidate's eligibility to take the EPPP Part 2 (skills) in accordance with established ASPPB policies.

How will you know if the EPPP Part 2 is a valid exam? Will there be studies addressing predictive, incremental, or concurrent validity?

Questions have been raised about the validity of the enhanced EPPP as a tool to assess the foundational knowledge and practice skills necessary for independent licensure. The enhanced EPPP Part 1 which assesses foundational knowledge and the EPPP Part 2 which assesses practice skills will be one component of the assessment of an applicant's readiness for licensure as a psychologist. The accepted standard of validity for credentialing and licensing exams is *content* validity, which is determined through a job task analysis. According to the Standards for Educational and Psychological Testing "validation of credentialing tests depend mainly on content-related evidence, often in the form of judgments that adequately represent the content domain associated with the occupation or specialty being considered" (p. 175) (AERA, APA & NCME, 2014)

The content of the EPPP has been validated through job task analyses over the last 50 years. The most recent job task analysis, completed in 2016, was conducted to address the validity of both the content and structure of the EPPP Part 1 and Part 2. Based on data from more than 2,700 licensed/registered psychologists in the United States and Canada, the 2016 study refined the ASPPB Competency Model and developed the blueprint for the EPPP Part 2. This Blueprint (and a more detailed description of the job task analysis from 2010 and 2016) can be found on the ASPPB website at www.asppb.net under the EPPP Part 2 section.

Other types of validity, such as predictive validity, are not appropriate for licensure examinations. The reason for this stems from the nature of the licensure process. Although questions such as "Would an applicant's score on the EPPP predict the likelihood of that person being disciplined by a licensing board?" or "Would the EPPP score predict improved patient outcomes?", sound like reasonable questions, they are not answerable by a licensure examination. Licensure examinations are a special type of selection exam where the goal is to separate test takers into those who pass or fail. Unlike other forms of assessment, the discriminatory power of the exam is at the pass point. Scores above and below the pass point are not relevant to the question of independent licensure readiness. A score that greatly exceeds the pass point does not indicate greater competence than a score that is just above the pass point. Both scores are passing scores. In order to examine predictive validity questions, it would be necessary to

compare an adequately sized and demographically similar sample of individuals who have passed both parts of the EPPP and individuals who have failed both parts of the EPPP. In this situation, both groups of individuals would be allowed to practice autonomously for a number of years so that their EPPP scores could be related to whatever criterion is selected to be the standard of “competence” (e.g., patient outcomes, no disciplinary complaints, etc.). An empirical investigation of predictive validity such as this is not feasible because it would depend on a sample of licensing boards allowing people who have been deemed to be unqualified to practice to actually practice autonomously. As such a scenario could involve potential harm to the public, it is hard to imagine that any licensing board would consent to take part in such a study.

In light of the pending inclusion of the EPPP Part 2 (the assessment of skills), questions have been raised about the incremental validity of Part 2 (skills) over Part 1 (knowledge). Incremental validity addresses the question of whether an additional means of assessment (i.e., Part 2 - skills) adds anything to an existing measure’s (i.e., Part 1 - knowledge) ability to predict the standing of test takers on an established criterion variable (Hunsley, 2003). The type of analysis necessary to evaluate incremental validity would not be consistent with the decision-making process used in a licensure context. This is because it is not simply a matter of whether a new piece of information accounts for significant additional variance in the predicted variable (even if an appropriate criterion variable could be identified). Instead, licensing boards have several requirements for licensure, all of which must be met before a license for autonomous practice is given. So, first, educational requirements must be met, followed by EPPP Part 1 and Part 2, possibly a state/provincial jurisprudence exam, positive supervisor ratings, and possibly an oral exam. Most of the requirements are sequential in nature so, as examples, one cannot take Part 1 (knowledge) without appropriate academic qualifications, and one cannot take Part 2 (skills) until Part 1 (knowledge) has been passed. In a licensure context, the data from these various evaluations should not be subjected to an incremental validity analysis because each discrete measure assesses an essential component of the ultimate decision to grant the license (J. Hunsley, personal communication, December 7, 2017).

In the case of the enhanced EPPP, the different parts (Parts 1 and 2) are designed to assess different essential components (knowledge and skills) of the overall construct of professional competence. Introduction of the EPPP Part 2 will enhance a licensing board’s ability to determine readiness for independent practice by measuring a key element (skills) that previously had not been evaluated, or was evaluated in a less standardized manner (e.g., supervisor ratings; (Johnson et al, 2008).

Finally, some individuals have inquired about concurrent validity studies; that is, studies that examine whether scores on the EPPP are correlated with other measures of competence. One of the confounding issues in conducting such validation studies is the question of the accuracy of those other measures of competence. For example, supervisor ratings of competence are widely used in academic and training environments, as well as by licensing boards, to assist in determining the competence of trainees. However, there are many questions about the accuracy of supervisor ratings due to the multiple roles that supervisors play (i.e., supervisor/mentor and gatekeeper; Johnson et al., 2008). Although it remains necessary for licensing boards to continue to use supervisor ratings for some aspects of the evaluation of candidate readiness for autonomous licensure (specifically for some aspects of interpersonal relationship competence), the introduction of the EPPP Part 2 provides a psychometrically sound, objective, standardized measure of many of the skills needed for independent practice. Licensing boards are tasked

with answering the ultimate question about those they license as psychologists: “Is this individual safe (competent) to practice independently?” Training supervisors are not responsible for that final approval, or for answering that ultimate question. The EPPP Part 2 will provide an objective, standardized and appropriately validated measure of professional skills to enhance a licensing board’s ability to answer that question.

How is the issue of potential bias of the EPPP in terms of ethnicity being addressed? Can you provide any assurances that the EPPP is a fair and nondiscriminatory exam?

The ASPPB Examination Program is committed to providing valid, reliable, and fair assessments of candidates for licensure. ASPPB adheres to guidelines of the American Psychological Association, the Joint Commission on Standards for Educational and Psychological Testing, and the American Educational Research Association in the development and maintenance of the Examination Program.

Potential item bias is addressed at each phase of test development and review. The initial step in the test development process consists of a large survey of psychological practice called a job task analysis or practice analysis. The survey sample reflects the racial, ethnic, cultural, gender, and geographic make-up of the profession and the composition of the subject matter experts who analyze the data was also diverse. The analysis of the survey results provide the areas that are to be assessed on each examination, resulting in specifications for the test “blueprint”.

EPPP item writers represent a diversity of racial, ethnic, geographic, gender, and practice characteristics. The item writing training that item writers receive involves, among other things, consideration of cultural and linguistic issues. Each item that is written is reviewed by members of the Item Development Committee, which is comprised of a group of content experts who together cover each domain area. Each potential exam item is reviewed for clarity, language, correctness, bias, and relevance for entry-level practice. The reviewers either return items to the writer for changes, or approve them to go on to the Examination Committee for review.

The Examination Committee is comprised of psychologists who represent various demographics, specialty areas, and expertise in each of the domain areas assessed on the examination. This committee reviews every new item and must reach consensus on each item before it is pretested on any examination. The reviews are similar to those that are done in the item writing process and provide an additional check on each item before it is placed on an examination form. As such, this committee provides another layer of review regarding fairness and relevance.

Items are pretested before they can be used as operational (scored) items. For the EPPP Part 1 (knowledge), there are an additional 50 pre-test questions included in mixed order with the 175 operational items. When an item is being pretested, that item appears on the examination, but is not counted toward the candidate’s exam score. An item is approved for use as a scored item only if its statistical performance is acceptable to members of the Examination Committee based on Item Response

Theory. Thus, the item must show itself to be a consistent, valid, and fair measure of the test-taker's knowledge or skills in a particular domain. This system of pretesting questions protects examination candidates by only using questions that have been proven effective in testing relevant entry-level knowledge, and beginning January 2020, testing relevant entry-level skills. Additionally, any candidate comments are reviewed, and items that candidates have reported as problematic are again reviewed by content experts to ensure fairness of each item.

After pretesting, items that meet established statistical criteria are once again reviewed by the Examination Committee before being placed on an exam as an operational item. Collectively, ASPPB incorporates these multiple layers of analyses to provide assurance to the extent possible that each question is free from bias. As a result of the safeguards that have been put in place, the EPPP Part 1 (knowledge) is viewed as a fair and nondiscriminatory examination of the knowledge necessary to practice psychology independently. Item development for the EPPP Part 2 (skills) will follow the same process to insure a bias free examination.

The question of ethnic bias in the enhanced EPPP has been raised during our discussions with various psychology groups. Those who comment about issues of bias typically cite Sharpless and Barber (2009, 2013) who reported that they found differences on scores and pass rates on the EPPP based on ethnicity. However, their study design did not allow them to state definitively that the differences they found reflected an ethnic bias as opposed to being an artifact of the training program attended. They concluded that it was "unknown whether minority applicants fare less well on the EPPP, or whether programs with higher percentages of minority students tend to have applicants of all ethnicities who pass at lower rates" (p.8).

Currently, ASPPB does not collect ethnicity information from candidates who register to take the EPPP. These data have not been collected due to historical legal prohibitions against collecting such data in most member jurisdictions (states and provinces). ASPPB is in the process of reviewing this position with our membership. For the benefit of the public, and for those seeking to enter the profession of psychology, ASPPB is consistently working to ensure that the enhanced EPPP is a fair and nondiscriminatory examination.

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